



JOHN OESCH
PLANT MANAGER

American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150

FAX NO. (216) 821-4568

RECEIVED

APR 08 1996

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

April 4, 1996

**CERTIFIED LETTER
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J
United States (U.S.) Environmental Protection Agency (EPA),
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604
Attention: Barbara Mazur

Z 134 815 513

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Boulevard
Chicago, Illinois 60604
Attention: Richard Clarizio

Z 134 815 514

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INCORPORATED(INC.)
CIVIL ACTION NUMBER C87 - 1284A (N.D. OHIO)**

Progress Report # 16

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order Number 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

D. SEBRING FACILITY -Closure and Post Closure Requirements:

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Administrative Code Number 3745-66-12(D)(4)

On January 9, 1996, Mr. Gary Deigan, Project Manager, Roy F. Weston, Inc. submitted to Mr. John Palmer, OEPA, December's Surcharge and Settlement Monitoring Monthly Report for American Steel Foundries's Sebring Landfill.

U.S. vs. Amsted, Industries, Inc.
Civil Action No. C87 - 1284A (N.D. Ohio)
Report Number 16 / April 10, 1996 / Page 2 of 6

In a letter dated February 2, 1996 to Ms. Bernadette Wellman, American Steel Foundries(ASF), Inc. Chicago, Illinois, Mr. John Palmer, OEPA, Division of Hazardous Waste Management, acknowledged receipt of and review of the Supplementary Groundwater Monitoring Supplementary Annual Report for 1994 for the Sebring Landfill. Based on that review he requested American Steel Foundries complete Section 2, line W - 5 for MW - 12, survey the top of well casing at MW - 13 to within +/- 0.01 feet and explain the usage of data qualifier "KL".

In a letter dated February 5, 1996 to Ms. Bernadette Wellman, American Steel Foundries, Inc., Chicago Illinois, Mr. John Palmer, OEPA, Division of Hazardous Waste Management, acknowledged receipt of American Steel Foundries' response to Ohio EPA's November 23, 1996 letter to Ms. Wellman regarding Ohio EPA's review of American Steel Foundries' December 1993 ground water quality analytical results. Mr. Palmer indicated that American Steel Foundries has adequately responded to the four comments identified in the November 23, 1996 letter.

In a letter dated February 8, 1996 from Mr. John Palmer, OEPA, Division of Hazardous Waste Management to Ms. Bernadette Wellman, American Steel Foundries Inc., Chicago, Illinois, Mr. Palmer indicated that American Steel Foundries adequately responded to the four comments in a March 6, 1995 letter to American Steel Foundries regarding the June 1994 water quality analytical results from analysis of samples of ground water at American Steel Foundries' Sebring landfill.

Accompanying a letter dated February 13, 1996 to Mr. John Palmer, Ohio EPA, Division of Hazardous Waste Management from Mr. Gary J. Deigan, Principal Project Manager, Roy F. Weston, Inc., was the Settlement Monitoring Report for American Steel Foundries Sebring Landfill for the eleventh month of settlement monitoring. At this time Mr. Palmer was notified that settlement monitoring Plate 2 (SP - 2) was bent over to an approximately 30 degree position. According to Mr. Deigan, a new riser elevation would be established and that subsequent measurements at SP-2 will then reflect relative settlement and these measurements could be added to prior months to reasonably reflect total settlement.

U.S. vs. Amsted, Industries, Inc.
Civil Action No. C87 - 1284A (N.D. Ohio)
Report Number 16 / April 10, 1996 / Page 3 of 6

In a letter dated February 15, 1996 Mr. John Palmer, Ohio EPA, Division of Hazardous Waste Management, acknowledged receipt of American Steel Foundries' Surcharge and Settlement Monitoring - Monthly Report (Eleventh Month). Mr. Palmer reviewed the submittal and had several comments requiring a response in the following month's report. He requested an explanation for the steep change in the rate of settlement at SP-1, an explanation for the sudden rebound at SP-2, and steps to be taken to compensate for the effects of frost heave.

In a letter dated February 20, 1996 from Ms. Bernadette Wellman, Manager - Environmental Affairs, American Steel Foundries, to Mr. John Palmer, Ohio EPA, Division of Hazardous Waste Management, Ms. Wellman notified Mr. Palmer of the receipt of the Notice of Deficiency (NOD) for the Sebring Landfill. Ms. Wellman advised Mr. Palmer that American Steel Foundries will prepare a revised Closure Plan in accordance with the NOD on or before April 30, 1996. Ms. Wellman also indicated that she would forward a draft response to the NOD by March 23, 1996.

In a letter dated March 1, 1996 Mr. John Palmer, Ohio EPA, Division of Hazardous Waste Management acknowledged that the review of American Steel Foundries' September 1995 Groundwater Monitoring Program Plan for the Sebring Landfill was complete. As the result of this review, Ohio EPA had several comments that were listed in the March 1 letter.

In a letter dated March 4, 1996 Mr. John Palmer, Ohio EPA, Division of Hazardous Waste Management acknowledged that the review of American Steel Foundries' March, 1995 ground water quality analytical results for the March semi-annual sampling event at the Sebring landfill was complete. Based on this review, several comments were listed within the letter. Mr. Palmer requested that American Steel Foundries respond to these comments by March 29, 1996 to the Ohio EPA North East District Office.

In a letter dated March 5, 1996 Mr. John Palmer, Ohio EPA, Division of Hazardous Waste Management acknowledged that the review of American Steel Foundries' September, 1995 ground water quality analytical results for the September semi-annual sampling event at the Sebring landfill was complete. Based on this review, several comments were listed within the letter. Mr. Palmer requested that American Steel Foundries respond by March 29, 1996 to the Ohio EPA North East District Office.

Accompanying a letter dated March 20, 1996 to Mr. John Palmer, Ohio EPA, Division of Hazardous Waste Management from Mr. Gary J. Deigan, Principal Project Manager, Roy F. Weston, Inc., was the Settlement Monitoring Report for American Steel Foundries Sebring Landfill for month 12 of settlement monitoring data. At this time Mr. Deigan responded to comments posed by Mr. Palmer in his February 15, 1996 letter regarding the February 13, 1996 settlement report for the Sebring landfill.

NOTE : During this last quarter there have been no construction activities at the Sebring Facility.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

A letter dated February 5, 1996 was sent from Pat Petrella, Environmental Engineer, American Steel Foundries, Alliance, Ohio to U.S. EPA, Ohio EPA, and the Mahoning County (Ohio) Health Department providing notification that semi-annual groundwater sampling would be conducted at American Steel Foundries' Sebring Landfill on February 22 and 23, 1996.

The first round of semiannual sampling at the Sebring landfill for 1996 was conducted by Roy F. Weston for American Steel Foundries on February 22 and 23, 1996 Roy F. Weston, Inc.

In a letter dated March 29, 1996 from Mr. John F. Oesch, Plant Manager, American Steel Foundries, Alliance Facility, to Chief RCRA Enforcement Branch, U.S. EPA and Chief, SWERB, Section V, Office of Regional Counsel, Mr. Oesch notified U.S. EPA, Ohio EPA, and The Mahoning County (Ohio) Health Department that revisions to Tables 3 through 6 of analytical data in the semiannual groundwater monitoring report for the sampling event at the Sebring Landfill dated September, 1995 were required. The revised tables were attached to the March 29, 1996 letter.

TEST RESULTS AND SAMPLING SUMMARY

American Steel Foundries plans to discontinue monitoring each load of Electric Arc Furnace (EAF) dust with the EPA Toxic Characteristic Leaching Procedure (TCLP) test for metals.

U.S. vs. Amsted, Industries, Inc.
Civil Action No. C87 - 1284A (N.D. Ohio)
Report Number 16 / April 10, 1996 / Page 5 of 6

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

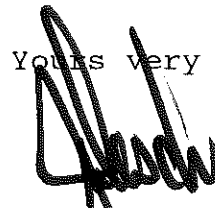
ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

A handwritten signature in black ink, appearing to read 'J. F. Oesch', written over a horizontal line.

J. F. Oesch
PLANT MANAGER

PPP / Attachment

U.S. vs. Amsted, Industries, Inc.
Civil Action No. C87 - 1284A (N.D. Ohio)
Report Number 15 / April 10, 1996 / Page 6 of 6

cc: REB
JFO / RBR / RML
PFF
BMW

Ohio EPA Z 134 815 515
Chief, Division of Solid and Hazardous Waste
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43268-0149

Ohio EPA Z 134 815 516
Division of Hazardous Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Ohio EPA Z 134 815 517
Supervisor, division of Solid and Infectious Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.
Amsted Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

Mahoning County Health District Z 134 815 566
Chief, Solid Waste Program
2801 Market Street
Youngstown, Ohio 44507-1649
Attn: R. D. Setty

C: \WP51\HAZWASTE\USVAMSTD.496

ATTACHMENT A

*UNITED STATES V. AMSTED INDUSTRIES, INCORPORATED (INC.)
CIVIL ACTION NUMBER C 87 - 1284A (N.D. OHIO)*

PROGRESS REPORT NUMBER 16

*ELECTRIC ARC FURNACE DUST COMPOSITE SAMPLE
REPORTS*

ENVIRITE CORPORATION
CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance Oh 44601

Report Date: 03/21/96
Envirite Waste Stream #: CS1373

Sample Collection Date: 03/18/96
Date Analysis Completed: 03/20/96

Waste Description: EAF Furnace Dust

Box # :

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.8 S.U.
Total CN (as received)	1.3 mg/kg
TCLP Arsenic	<0.0077 mg/l
TCLP Barium	<1.6 mg/l
TCLP Cadmium	1.9 mg/l
TCLP Chromium	<0.10 mg/l
TCLP Lead	0.82 mg/l
TCLP Mercury	0.0032 mg/l
TCLP Nickel	<0.30 mg/l
TCLP Selenium	<0.0080 mg/l
TCLP Silver	<0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by :


QA/RC Coordinator

cc: File

FAX: 03/21/96	# PAGES - 1	From: CHERYL HAWKINS
TO: PAT PETRELLA		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUNDRIES		Phone: 330-456-6238
FAX #: 330-821-4568		FAX #: 330-456-2801

ENVIRITE CORPORATION
CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance Oh 44601

Report Date: 03/05/96
Envirite Waste Stream #: CS1373

Sample Collection Date: 02/23/96
Date Analysis Completed: 02/29/96


Waste Description: EAF Furnace Dust

Box #: 117

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.5 S.U.
Total CN (as received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/l
TCLP Barium	<1.6 mg/l
TCLP Cadmium	1.7 mg/l
TCLP Chromium	<0.10 mg/l
TCLP Lead	0.98 mg/l
TCLP Mercury	<0.0008 mg/l
TCLP Nickel	0.62 mg/l
TCLP Selenium	<0.0080 mg/l
TCLP Silver	<0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/RC Coordinator

cc: File

FAX: 03/05/96	# PAGES - 1	From: CHERYL HAWKINS
TO: PAT PETRELLA		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUNDRIES		Phone: 216-456-6238
FAX #: 216-821-4568		FAX #: 216-456-2801

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 04/03/96
Envirite Waste ID#: CS1373

Sample Collection Date: 02/01/96
Date Analysis Completed: 02/06/96

Waste Description: E A F Furnace Dust

<u>Parameter</u>	<u>Results</u>
pH (As Received)	11.0 s.u.
Total CN (As Received)	0.52 mg/L
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	1.9 mg/L
TCLP Cadmium	1.2 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	0.72 mg/L
TCLP Mercury	<0.0023 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/l
TCLP Silver	<.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/QC Coordinator

FAX : 04/03/96	#Pages - 1	From: Ed Konz
TO: Pat Petrella		ENVIRITE CORPORATION
CO: American Steel Foundries		Phone: 330-456-6238
FAX#: 1-330-821-4568		FAX#: 330-456-2801

ENVIRITE CORPORATION
CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance Oh 44601

Report Date: 01/23/96
Envirite Waste Stream #: CS1373

Sample Collection Date: 01/12/96
Date Analysis Completed: 01/18/96


Waste Description: EAF Furnace Dust

Box #: none given

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.7 S.U.
Total CN (as received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/l
TCLP Barium	<1.6 mg/l
TCLP Cadmium	1.8 mg/l
TCLP Chromium	<0.10 mg/l
TCLP Lead	<0.64 mg/l
TCLP Mercury	0.0022 mg/l
TCLP Nickel	0.24 mg/l
TCLP Selenium	<0.0080 mg/l
TCLP Silver	<0.082 mg/l

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Analysis Approved by :


Q/RC Coordinator

cc: File

FAX: 01/23/96	# PAGES - 1	From: CHERYL HAWKINS
TO: PAT PETRELLA		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUNDRIES		Phone: 216-456-6238
FAX #: 216-821-4568		FAX #: 216-456-2801



JOHN OESCH
PLANT MANAGER

American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150

FAX NO. (216) 821-4568

RECEIVED

JAN 16 1996

January 10, 1996

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

**CERTIFIED LETTER
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Barbara Mazur

Z 134 815 427

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

Z 134 815 428

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

Progress Report # 15

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

D. SEBRING FACILITY -Closure and Post Closure Requirements:

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Admin. Code # 3745-66-12(D)(4)

In a letter dated October 11, 1995 addressed to Ms. Bernadette Wellman, ASF from Mr. John Palmer, Ohio EPA, Mr. Palmer acknowledged receipt of September's Surcharge and Settlement Monitoring Rept. for ASF.

On November 7, 1995, Mr. Gary Deigan, Project Manager, Roy F. Weston, Inc. submitted to Mr. John Palmer, OEPA, October's Surcharge and Settlement Monitoring - Monthly Report for ASF's

Sebring landfill (OHD 017 497 587). In the same letter, Mr. Deigan notified Mr. Palmer that Tecumseh Berm Pond construction has been postponed until spring of 1996 due to delays in obtaining property access, excessive pond pumping schedule, and the conclusion of the regular construction season.

On November 9, 1995, Mr. John Palmer, OEPA acknowledged receipt of October's Surcharge and Settlement Monitoring Monthly Rept. for ASF's Sebring Landfill in a letter addressed to Ms Bernadette Wellman, ASF, Chicago. Mr. Palmer requested notification of the start of construction activities at the Tecumseh Pond in the Spring.

In a letter dated December 8, 1995 from Mr. Gary Deigan, Roy F. Weston, Inc. to Mr. John Palmer, Environmental Specialist, NEDO, OEPA, Mr. Deigan submitted to Mr. Palmer the Surcharge and Settlement Monitoring - Monthly Report for ASF Sebring Landfill for the month of November, 1995.

NOTE : During this last quarter there have been no construction activities at the Sebring Facility.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.

6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

The second round of semiannual sampling at the Sebring landfill was conducted the week of Sept. 18, 1995 by Roy F. Weston for ASF. On November 16, 1995, Messrs. Gary Deigan and Gregory S. Kinsall of Roy F. Weston, Inc. submitted to Ms. Bernadette Wellman, ASF, Chicago the Semiannual Groundwater Monitoring Rept. for sampling activities conducted on Sept. 19 and 20, 1995 at the ASF landfill in Sebring, Ohio. Following some minor adjustments, the report was submitted to EPA.

On December 15, 1995, in a letter from Mr. John Oesch, ASF, Alliance Plant Manager, to Ms. Barbara Mazur, Chief, RCRA Enforcement Branch, US EPA, Region V, ASF submitted the Semiannual Groundwater Monitoring Rept., for samples collected on Sept. 19 and 20, 1995 at the Sebring Landfill. Tentative conclusions drawn from these results indicate that Landfill Wastes are not impacting local groundwater.

On December 26, 1995, Mr. John Palmer, OEPA notified Ms. Bernadette Wellman, ASF, Chicago that the Semiannual Groundwater Monitoring Results - Sept., 1995 were received by OEPA. The letter indicated that the OEPA, Division of Drinking Water was reviewing the submittal and that results would be forwarded to ASF upon completion of the review.

TEST RESULTS AND SAMPLING SUMMARY

American Steel Foundries plans to monitor each load of EAF dust with the EPA Toxic Characteristic Leaching Procedure (TCLP) test for metals for an indefinite period.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

ACTIONS NOT COMPLETED AS REQUIRED

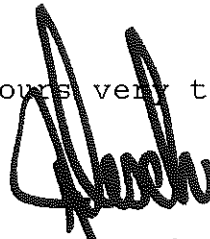
As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

U.S. vs. Amsted, Industries, Inc.
Civil Action No. C87 - 1284A (N.D. Ohio)
Rept. No. 15 / January 10, 1996 / Page 4 of 5

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

A handwritten signature in black ink, appearing to read 'J. F. Desch', written over the typed name.

J. F. Desch
PLANT MANAGER

PPP
Attachment

I.S. vs. Amsted, Industries, Inc.
Civil Action No. C87 - 1284A (N.D. Ohio)
Rept. No. 15 / January 10, 1996 / Page 5 of 5

cc: REB
BMW
PFF
RML
RBR

Ohio EPA Z 134 815 429
Chief, Division of Solid and Hazardous Waste
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43268-0149

Ohio EPA Z 134 815 430
Division of Hazardous Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Ohio EPA Z 134 815 431
Supervisor, division of Solid and Infectious Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.
Amsted Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

Mahoning County Health District Z 134 815 432

Chief, Solid Waste Program
2801 Market Street
Youngstown, Ohio 44507-1649
Attn: R. D. Setty

C: \WP51\HAZWASTE\USVAMSTD.196

APPENDIX A

ELECTRIC ARC FURNACE DUST SAMPLE

COMPOSITE REPORTS

ENVIRITE CORPORATION
CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance Oh 44601

Report Date: 01/03/96
Envirite Waste Stream #: CS1373

Sample Collection Date: 12/21/95
Date Analysis Completed: 12/28/95

Waste Description: EAF Furnace Dust

Sample #: 117

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	7.1 S.U.
Total CN (as received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/l
TCLP Barium	<1.6 mg/l
TCLP Cadmium	1.6 mg/l
TCLP Chromium	0.66 mg/l
TCLP Lead	<0.64 mg/l
TCLP Mercury	0.0021 mg/l
TCLP Nickel	<0.30 mg/l
TCLP Selenium	<0.0080 mg/l
TCLP Silver	<0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by :


QA/RC Coordinator

cc: File

FAX: 12/08/95	# PAGES - 1	From: CHERYL HAWKINS
TO: PAT PETRELLA		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUNDRIES		Phone: 216-456-6238
FAX #: 216-821-4568		FAX #: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 100495A

BOX NO.

115

Request Submitted by: T.C. BRADWAY

Date Submitted: 10/4/95

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 10/4/95 Time of Sampling: 5:00 AM/PM
Sampler's Name: T.C. BRADWAY

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature: T.C. Bradway

Witness's Name: J. Burky

Title and Affiliation of Witness: REC'D DUST SAMPLE 10-4-95

Witness's Signature: Robert Miller

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 112895A

BOX NO.

Request Submitted by: PAT PETRELLA

Date Submitted: 11/28/95

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 11/21/95 Time of Sampling: Composite AM/PM

Sampler's Name: PAT PETRELLA

Title and Affiliation of Sampler: ENVIRONMENTAL ENGINEER, AMERICAN STEEL FOUNDRY

Sampler's Signature: Pat Petrella

Witness's Name:

Title and Affiliation of Witness:

Witness's Signature: Robert J. Miller

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.



ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance Oh 44601

Report Date: 12/08/95
Envirite Waste Stream #: CS1373

Sample Collection Date: 11/02/95
Date Analysis Completed: 12/01/95

Waste Description: EAF Furnace Dust

Sample #: 112895A **

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.9 S.U.
Total CN (as received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/l
TCLP Barium	<1.6 mg/l
TCLP Cadmium	1.3 mg/l
TCLP Chromium	<0.10 mg/l
TCLP Lead	<0.64 mg/l
TCLP Mercury	<0.0008 mg/l
TCLP Nickel	<0.30 mg/l
TCLP Selenium	<0.0080 mg/l
TCLP Silver	<0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by :

Cheryl Hawkins
QA/RC Coordinator

cc: File

** BOX NUMBER NOT STATED ON REQUEST FORM

FAX: 12/08/95	# PAGES - 1	From: CHERYL HAWKINS
TO: PAI PETRELLA		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUNDRIES		Phone: 216-456-6238
FAX #: 216-821-4568		FAX #: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373
Waste Code: D006, D008
Volume: _____
Date Results Needed: ⁷ TO 10 DAYS
Frequency: EACH BOX

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 310194
110295A

BOX NO. 116

Request Submitted by: PAT PETRELLA

Date Submitted: 11-2-95

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 11/2/95 Time of Sampling: Composite AM/PM
Sampler's Name: PAT PETRELLA

Title and Affiliation of Sampler: ENVIRONMENTAL ENGINEER, AMERICAN STEEL FOUNDRY

Sampler's Signature: [Signature]

Witness's Name: REC'D SAMPLE 11-2-95 JLA

Title and Affiliation of Witness: X.R. Miller 11-2-95

Witness's Signature: _____

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION
CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance Oh 44601

Report Date: 11/10/95
Envirite Waste Stream #: CS1373

Sample Collection Date: 11/02/95
Date Analysis Completed: 11/06/95


Waste Description: EAF Furnace Dust

Box: 116

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.7 S.U.
Total CN (as received)	0.50 mg/kg
TCLP Arsenic	<0.0077 mg/l
TCLP Barium	<1.6 mg/l
TCLP Cadmium	1.5 mg/l
TCLP Chromium	<0.10 mg/l
TCLP Lead	<0.64 mg/l
TCLP Mercury	<0.0008 mg/l
TCLP Nickel	<0.30 mg/l
TCLP Selenium	0.051 mg/l
TCLP Silver	<0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by :


QA/QC Coordinator

cc: File

FAX: 11/10/95	# PAGES - 1	From: CHERYL HAWKINS
TO: PAT PETRELLA		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUNDRIES		Phone: 216-456-6238
FAX #: 216-821-4568		FAX #: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 110295A

BOX NO.

110

Request Submitted by: PAT PETRELLA

Date Submitted: 11/2/95

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: Time of Sampling: AM/PM
Sampler's Name: PAT PETRELLA
Title and Affiliation of Sampler: ENVIRONMENTAL ENGINEER, AMERICAN STEEL FOUNDRY
Sampler's Signature: Pat Petrella
Witness's Name: Rec'd 10-18-95 JLB
Title and Affiliation of Witness: X B. Miller
Witness's Signature:

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.



ENVIRITE CORPORATION
CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance Oh 44601

Report Date: 10/26/95
Envirite Waste Stream #: CS1373

Sample Collection Date: 10/18/95
Date Analysis Completed: 10/20/95

Waste Description: EAF Furnace Dust

Box: 110

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.9 S.U.
Total CN (as received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/l
TCLP Barium	<1.6 mg/l
TCLP Cadmium	1.5 mg/l
TCLP Chromium	<0.10 mg/l
TCLP Lead	<0.64 mg/l
TCLP Mercury	<0.0008 mg/l
TCLP Nickel	1.2 mg/l
TCLP Selenium	<0.0080 mg/l
TCLP Silver	<0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by :


QA/RC Coordinator

cc: File

FAX : 10/26/95	# PAGES - 1	From: CHERYL HAWKINS
TO: PAT PETRELLA		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUNDRIES		Phone: 216-456-6238
FAX #: 216-821-4568		FAX #: 216-456-2801



JOHN OESCH
PLANT MANAGER

American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150

FAX NO. (216) 821-4568

October 10, 1995



**CERTIFIED LETTER
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Barbara Mazur

Z 309 033 251

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

Z 309 033 252

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

Progress Report # 14

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

D. SEBRING FACILITY -Closure and Post Closure Requirements:

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Admin. Code # 3745-66-12(D)(4)

In a June 30, 1995 letter from Mr. Gary J. Deigan, Roy F. Weston Inc. to Mr. John Palmer, OEPA, a followup to the June 13, 1995 letter was provided regarding Tecumseh Pond / Sebring Landfill Separation Berm. The letter supported the June 13, 1995 Surcharge and Settlement Monitoring Report for the Sebring Landfill. Weston concluded that Closure will ensure a less than 50 % rapid drawdown of pool depth in the pond before drawdown based on data collected thus far.

A July 7, 1995 letter from Mr. John Palmer, OEPA to Ms. Bernadette Wellman, ASF confirmed receipt of ASF's June 30, 1995 Separation Berm Report for the Sebring landfill as prepared by Roy F. Weston, Inc. OEPA's Central Office would respond with their analysis and comments through Mr. John Palmer, OEPA.

On July 13, 1995 Mr. Gary J. Deigan, Weston, submitted the Monthly Surcharge and Settlement Report for ASF's Sebring Landfill for the month of June in accordance with the approved Surcharge and Settlement Plan for the site.

A July 18, 1995 letter from Mr. John Palmer, OEPA to Ms. Bernadette Wellman, ASF confirms receipt of the July 13 submittal from Mr. Deigan and acknowledges approval of the report.

On August 9, 1995 Mr. Gary J. Deigan, Weston, submitted the Monthly Surcharge and Settlement Report for ASF's Sebring Landfill for the month of July in accordance with the approved Surcharge and Settlement Plan for the site.

On September 11, 1995 Mr. Gary J. Deigan, Weston, submitted the Monthly Surcharge and Settlement Report for ASF's Sebring Landfill for the month of August in accordance with the approved Surcharge and Settlement Plan for the site.

A September 15, 1995 letter from Mr. John Palmer, OEPA to Ms. Bernadette Wellman, ASF confirms receipt of the Sept. 11 submittal from Mr. Deigan and acknowledges approval of the report.

NOTE : During this last quarter there have been no construction activities at the Sebring Facility.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.

6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

In an August 21, 1995 letter to Ms. Burnadette Wellman, ASF, Mr. John Palmer acknowledged receipt of the company's March, 1995 Semiannual Groundwater Monitoring Report. It was received on August 18, 1995. A copy of this report with the above letter was sent to U.S. EPA Region V, RCRA Enforcement and SWERB Section V, Regional Counsel. The report is currently under review by both agencies.

The second round of semiannual sampling at the Sebring landfill was conducted the week of Sept. 18, 1995 by Roy F. Weston for ASF. At the time of this submittal, ASF is awaiting sampling results and a report from Roy F. Weston, Inc.

TEST RESULTS AND SAMPLING SUMMARY

American Steel Foundries plans to monitor each load of EAF dust with the EPA Toxic Characteristic Leaching Procedure (TCLP) test for metals for an indefinite period.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,


J. F. Oesch
PLANT MANAGER

PPP
Attachment

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: REB
BMW
PFF
RML
RBR

Ohio EPA Z 309 033 254
Chief, Division of Solid and Hazardous Waste
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43268-0149

Ohio EPA Z 309 033 255
Division of Hazardous Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Ohio EPA Z 309 033 256
Supervisor, division of Solid and Infectious Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.
Amsted Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

Mahoning County Health District Z 309 033 257
Chief, Solid Waste Program
2801 Market Street
Youngstown, Ohio 44507-1649
Attn: R. D. Setty

C:\WP51\HAZWASTE\USVAMSTD.PP7

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 071895A BOX NO. 111

Request Submitted by: T.C. BRADWAY

Date Submitted: 7/18/95

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 7/18/95 Time of Sampling: Composite AM/PM

Sampler's Name: T.C. BRADWAY

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature:

Witness's Name:

Title and Affiliation of Witness:

Witness's Signature:

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 07/31/95
Envirite Waste ID#: CS1373

Sample Collection Date: 07/18/95
Date Analysis Completed: 07/25/95

Waste Description: EAF Furnace Dust

BOX #: 111

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.7 S.U.
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/l
TCLP Barium	<1.6 mg/l
TCLP Cadmium	1.8 mg/l
TCLP Chromium	0.14 mg/l
TCLP Lead	1.0 mg/l
TCLP Mercury	0.0026 mg/l
TCLP Nickel	<0.30 mg/l
TCLP Selenium	<0.0080 mg/l
TCLP Silver	<0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/QC Coordinator

cc: File

FAX : 7/31/95	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 090895A BOX NO. 116

Request Submitted by: T.C. BRADWAY

Date Submitted: 9/8/95

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 9/8/95 Time of Sampling: Comp. AM/PM
Sampler's Name: T.C. BRADWAY
Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES
Sampler's Signature: T.C. Bradway
Witness's Name:
Title and Affiliation of Witness: REC'D SAMPLE 9-8-95 X 2/08
Witness's Signature: J. B. Bury

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION
CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance Oh 44601

Report Date: 09/18/95
Envirite Waste Stream #: CS1373

Sample Collection Date: 09/08/95
Date Analysis Completed: 09/12/95

Waste Description: EAF Furnace Dust

Box: 116

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.8 S.U.
Total CN (as received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/l
TCLP Barium	1.6 mg/l
TCLP Cadmium	1.0 mg/l
TCLP Chromium	<0.10 mg/l
TCLP Lead	0.56 mg/l
TCLP Mercury	<0.0008 mg/l
TCLP Nickel	<0.30 mg/l
TCLP Selenium	<0.0080 mg/l
TCLP Silver	<0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by : .

Cheryl Hawkins
QA/QC Coordinator

cc: File

FAX : 9/27/95	# PAGES - 1	From: CHERYL HAWKINS
TO: PAT PETRELLA		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUNDRIES		Phone: 216-456-6238
FAX #: 216-821-4568		FAX #: 216-456-2801

ENVIRITE CORPORATION**CERTIFICATION ANALYSIS REPORT**

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 07/18/95
Envirite Waste ID#: CS1373

Sample Collection Date: 06/28/95
Date Analysis Completed: 07/13/95

Waste Description: EAF Furnace Dust BOX #: 115

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.8 S.U.
Total CN (As Received)	0.50 mg/kg
TCLP Arsenic	<0.0077 mg/l
TCLP Barium	<1.6 mg/l
TCLP Cadmium >	3.0 mg/l
TCLP Chromium	<0.10 mg/l
TCLP Lead > 5.	<0.64 mg/l
TCLP Mercury	0.0037 mg/l
TCLP Nickel	<0.30 mg/l
TCLP Selenium	<0.0080 mg/l
TCLP Silver	<0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QA/RC Coordinator

cc: File

FAX : 7/18/95	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801



BROWNING-FERRIS INDUSTRIES

WCD No. AB

75167

OH 217218, 219, 960724233914

BFI WASTE CODE 220,855,965

WASTE APPROVAL REQUEST

BFI to complete this area

BFI Initiator: H. Casan Jr.

Location: Willow Creek / Massillon

Company Number: 219-611

Telephone: (216) 947-2000 2548

Fax: (216) 947-2724

Date: 7-13-95

Action Requested: ☒ New Waste Approval

☐ Up-Date Approval - Previous Number: _____

Disposal Site Requested: 217-218-219-220-855-965

Company Number: _____

Management Method Requested: ☒ Landfill ☒ Hauling

☐ Other _____

WASTE CHARACTERIZATION DATA SPECIAL WASTE

IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED.

1. GENERATOR INFORMATION

a) Generator's Name: American Steel Foundries

b) Generating Facility's Address: 100 E. Broadway

City: Alliance State: OH Zip: 44601

c) Generator's Representative: T.C. Broadway

Title: Env. Mgr.

Telephone: (216) 823-6150

Fax: (216) _____

d) Emergency/Information Contact: SAms

Title: _____

Telephone: () _____

e) State/Provincial/Local Registration No.: _____

Generator's EPA Id. No.: 040581050418

Industry Description/SIC Code: _____

f) Customer's Name: _____

g) Customer's Mailing Address: _____

City: _____ State: _____ Zip: _____

h) Representative: _____

Telephone: () _____

Fax: () _____

2. GENERAL WASTE STREAM INFORMATION

a) Name/Description of The Waste: BSP 2000 LIQUID PARTING AGENT + 0.1 DAY PARTING AGENT

b) Process Generating Waste: CORE ROOM CLEAN UP

c) Is this a treatment residue of a waste which was previously a restricted hazardous waste? ☐ Yes ☒ No

If yes, describe the waste and the process generating the waste prior to treatment: _____

d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Regulations? ☐ Yes ☒ No

If yes, enter the Waste Identification Number if one has been assigned: _____

e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State, Provincial, or local Regulations?

☐ Yes ☒ No If yes, enter Waste Identification Number: _____

f) Recommended personal protection equipment and special handling procedures: None

g) Anticipated Volume: < 25 ☒ Cubic Yards ☐ Tons ☐ Gallons ☐ Cubic Meters ☐ Tonnes(metric)

Other _____ Per: ☒ Year ☐ Month ☐ Week ☐ Day ☐ One Time ☐ Other _____

To be transported in: ☒ Bulk ☐ Drums (type/size) _____ ☐ Other _____

h) Is a representative sample included? ☒ Yes ☐ No

3. WASTE PROPERTIES AT 72°F

a) Physical State:

☒ Solid ☐ Semi-solid

☐ Powder ☐ Liquid

☐ Combination

b) Layers:

☒ Single-layered ☐ Bi-layered ☐ Multi-layered

c) Colors(s):

Describe BROWN WITH BLACK

d) Odor:

Describe None

☐ None ☐ Mild ☐ Strong

e) Density Range: _____ to _____

☒ N/D ☐ lbs/gal. ☐ g/cc.

☐ lbs./yd.³ ☐ Kg/m³ ☐ Other _____

f) Flash Point, °F:

☐ ≤ 72 ☐ 73-100 ☐ 101-140

☐ 141-200 ☐ ≥ 201 ☐ N/A ☒ N/D

g) pH:

☐ ≤ 2 ☐ 2.1 - 5.0 ☐ 5.1 - 9.0

☐ 9.1 - 12.4 ☐ ≥ 12.5 ☐ N/A ☒ N/D

BFI WASTE CODE

4. REACTIVITY	5. THIS WASTE CONTAINS	6. SPECIAL WASTE COMPOSITION																																
<p>Note if the waste exhibits any of the following reactive properties:</p> <p> <input type="checkbox"/> Water Reactive <input type="checkbox"/> Acid Reactive <input type="checkbox"/> Alkaline Reactive <input type="checkbox"/> Oxidizer <input type="checkbox"/> Autopolymerizable <input type="checkbox"/> Pyrophoric <input type="checkbox"/> Explosive <input type="checkbox"/> Thermally Sensitive <input type="checkbox"/> Shock Sensitive <input checked="" type="checkbox"/> None of the above </p>	<p>Note if the waste contains any of the following: If any are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6.</p> <table style="width:100%;"> <tr> <td><input type="checkbox"/> Free Liquids</td> <td><input type="checkbox"/> OSHA Substances</td> </tr> <tr> <td><input type="checkbox"/> Free Cyanide</td> <td><input type="checkbox"/> Etiological Agents</td> </tr> <tr> <td><input type="checkbox"/> Free Sulfide</td> <td><input type="checkbox"/> Pathogens</td> </tr> <tr> <td><input type="checkbox"/> Free Ammonia</td> <td><input type="checkbox"/> Biological Materials</td> </tr> <tr> <td><input type="checkbox"/> Dioxins</td> <td><input type="checkbox"/> Radioactive Materials</td> </tr> <tr> <td><input type="checkbox"/> Organic Solvents</td> <td><input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761</td> </tr> <tr> <td><input type="checkbox"/> Virgin Oils</td> <td><input checked="" type="checkbox"/> None of the Above</td> </tr> <tr> <td><input type="checkbox"/> Used Oils</td> <td></td> </tr> </table>	<input type="checkbox"/> Free Liquids	<input type="checkbox"/> OSHA Substances	<input type="checkbox"/> Free Cyanide	<input type="checkbox"/> Etiological Agents	<input type="checkbox"/> Free Sulfide	<input type="checkbox"/> Pathogens	<input type="checkbox"/> Free Ammonia	<input type="checkbox"/> Biological Materials	<input type="checkbox"/> Dioxins	<input type="checkbox"/> Radioactive Materials	<input type="checkbox"/> Organic Solvents	<input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761	<input type="checkbox"/> Virgin Oils	<input checked="" type="checkbox"/> None of the Above	<input type="checkbox"/> Used Oils		<p>Concentration ranges are suggested and units must be identified in percentages (%) and/or parts per million (ppm). Attach additional pages if necessary.</p> <table style="width:100%;"> <thead> <tr> <th style="text-align: left;">Components</th> <th style="text-align: center;">Range Min. / Max.</th> </tr> </thead> <tbody> <tr> <td><u>OIL Dry</u></td> <td style="text-align: center;"><u>95</u></td> </tr> <tr> <td><u>PARTING AGENT</u></td> <td style="text-align: center;"><u>5</u></td> </tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Components	Range Min. / Max.	<u>OIL Dry</u>	<u>95</u>	<u>PARTING AGENT</u>	<u>5</u>										
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<u>PARTING AGENT</u>	<u>5</u>																																	
7. TRANSPORTATION INFORMATION																																		
<p>If the waste is a DOT Hazardous Material, complete the following:</p> <p>Proper USDOT Shipping Name: <u>NONE</u></p> <p>USDOT Hazard Class: _____ UN or NA Number: _____ CERCLA Reportable Quantity: _____</p>																																		
8. SUPPLEMENTAL INFORMATION																																		
<p> <input type="checkbox"/> None <input checked="" type="checkbox"/> MSD Sheets <input type="checkbox"/> Analytical Data <input type="checkbox"/> Chain of Custody <input type="checkbox"/> Memo/Letter <input type="checkbox"/> Waste Composition </p> <p>Other - describe: _____ No. of Pages: _____</p>																																		
9. GENERATOR'S CERTIFICATION																																		
<p>I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omissions of composition or properties exist, that all known or suspected hazards have been disclosed, and that the waste is not a regulated hazardous waste by the USEPA, by an applicable State or Provincial authority, or by any applicable local authority, and does not contain PCBs regulated by TSCA (i.e., 40 CFR 761) or any Provincial authority.</p> <p>GENERATOR'S AUTHORIZED SIGNATORY as identified in Section 1 (c):</p> <p> <u>6/5/95</u> <u>T.C. BRADWAY</u> <u>T.C. Bradway</u> <u>ENVIRONMENTAL MANAGER</u> DATE PRINT NAME SIGNATURE TITLE </p>																																		
REPRESENTATIVE SAMPLE CERTIFICATION																																		
<p>This Section is to be completed by the person obtaining the sample of the above described waste.</p> <p>I certify that the sample for which analytical data was provided on the waste described above is representative of that waste and was collected and preserved in a manner consistent with accepted technical standards.</p> <p>Lab sample assigned to: <u>Deyor</u> (peel off label)</p> <p>Collector's Name: <u>T.C. BRADWAY</u></p> <p>Signature: <u>T.C. Bradway</u></p> <p>Company: <u>AMERICAN STEEL FOUNDRIES</u></p> <p>Title: <u>ENVIRONMENTAL MGR</u></p> <p>Telephone Number: <u>(216) 823-6150</u></p> <p>Date Collected: <u>6/2/95</u></p> <p style="text-align: right; font-size: 1.5em;"><u>AB 75167</u></p>																																		

WCD# AB75167

95105932

LAB ID NO.

95 105932

DATE SAMPLED

TIME

RECEIVED

06/02/95

13:00

06/02/95

REPORTED

BFI WASTE SYSTEMS OF OHIO, INC.

5932

00000

06/09/95

	RESULT	REFERENCE LIMIT	UNITS
TCLP EXTRACTION PROC			
ZERO HEADSPACE EXTRT			
TCLP METALS & BIAS %			
ARSENIC	<1.0	0.0	5.0
Spike recovery	100		MG/L
BARIUM	<0.5	0.0	100.0
Spike recovery	108		MG/L
CADMIUM	<0.05	0.0	1.0
Spike recovery	98		MG/L
CHROMIUM	<0.05	0.0	5.0
Spike recovery	98		MG/L
SELENIUM	<0.3	0.0	1.0
Spike recovery	96		MG/L
MERCURY	<0.003	0.0	0.2
Spike recovery	101		MG/L
LEAD	<0.2	0.0	5.0
Spike recovery	96		MG/L
SILVER	<0.2	0.0	5.0
Spike recovery	103		MG/L
TCLP SUPPL. METALS			
NICKEL	<0.2		MG/L
Spike recovery	100		%
COPPER	<0.05		MG/L
Spike recovery	99		%
ZINC	0.36		MG/L
Spike recovery	98		%
TCLP VOA'S & BIAS %			
METHOD NUMBER	8240		
VINYL CHLORIDE	<0.002	0.0	0.2
Spike recovery	92		MG/L
1,1-DICHLOROETHYLENE	<0.002	0.0	0.7
Spike recovery	98		MG/L
METHYL ETHYL KETONE	<1.0	0.0	200
Spike recovery	107		MG/L
CHLOROFORM	<0.002	0.0	6.0
Spike recovery	96		MG/L
CARBON TETRACHLORIDE	<0.002	0.0	0.5
Spike recovery	94		MG/L

--- DIRECTORS ---

Patrick K. Jaynes Ph.D.

Anthony Nasrallah Ph.D.

DEYOR METPATH
Laboratories
a CORNING Company

7655 Market Street, Suit 2500

Youngstown, Ohio 44512

(216) 758-5788

(800) 365-3396

BFI WASTE SYSTEMS OF OHIO, INC.

(MASSILLON ACCOUNT)

1043 STATE ROUTE 225

ATWATER

OH 44201

Reference limits provided for comparison only.
Apply to new samples only. Not for reanalysis.
Is applied to new samples only.

61215-111-1117-1113

WCD# AB75167

95105932

LAB ID NO.

95 105932

DATE SAMPLED
06/02/95

TIME
13:00

RECEIVED
06/02/95
REPORTED
06/09/95

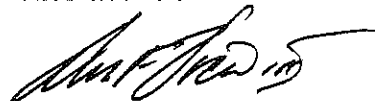
BFI WASTE SYSTEMS OF OHIO, INC.

5932

00000

	RESULT	REFERENCE	LIMIT	UNITS
BENZENE	<0.002	0.0	0.5	MG/L
Spike recovery	98			%
1,2-DICHLOROETHANE	<0.002	0.0	0.5	MG/L
Spike recovery	102			%
TRICHLOROETHYLENE	<0.002	0.0	0.5	MG/L
Spike recovery	103			%
TETRACHLOROETHYLENE	<0.002	0.0	0.7	MG/L
Spike recovery	101			%
CHLOROBENZENE	<0.002	0.0	100.0	MG/L
Spike recovery	106			%
1,4-DICHLOROBENZENE	<0.002	0.0	7.5	MG/L
Spike recovery	106			%
TCLP REVIEW				

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846
AS REVISED NOVEMBER 24, 1992 (57FR55114)
REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR



--- DIRECTORS ---

Patrick K. Jaynes Ph.D.
Anthony Nasrallah Ph.D.

 **DEYOR METPATH**
Laboratories
a CORNING Company

7655 Market Street, Suit 2500
Youngstown, Ohio 44512
(216) 758-5788
(800) 365-3396

BFI WASTE SYSTEMS OF OHIO, INC.
(MASSILLON ACCOUNT)
1043 STATE ROUTE 225
ATWATER OH 44201

Printed on: 06/02/95 13:00
Page: 1 of 1
Job: 95105932



JOHN OESCH
PLANT MANAGER

American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150

FAX NO. (216) 821-4568

July 05, 1995

**CERTIFIED LETTER
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Barbara Mazur

Z 055 522 324

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

Z 055 522 325

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

RESPONSE TO OEPA 06/21/95 LETTER

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

5. After implementation of the Alliance Closure Plan, only in the event that clean closure cannot be achieved, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Alliance Post Closure Plan in accordance with the requirements of 40 C.F.R. # 265.117 through 265.120 and Ohio Admin. Code # 3745-66-17 through 20. If Ohio EPA does not approve the Alliance Post Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or Modified Alliance Post-Closure Plan, in accordance with 40 C.F.R. # 265.118 (d) (4) and (f) and Ohio Admin.. Code # 3745-66-18 (D) (4) and (F). Immediately upon receipt of final approval or modification of the Alliance Post-Closure Plan by Ohio EPA, Defendant shall implement such Plan.

-1-

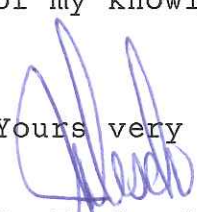
In a June 21, 1995 letter from Mr. John Palmer, Environmental Specialist, Ohio EPA requested clarification of membrane thickness terminology in Sections 4.1 & 4.5 of the "CLOSURE CERTIFICATION REPORT FOR ELECTRIC ARC FURNACE BAGHOUSE HAZARDOUS WASTE MANAGEMENT UNIT".

Please be advised that American Steel Foundries confirms the Ohio EPA assumption that (ML) referred to in sections 4.1 & 4.5 should have been (MIL) and that in both cases, the unit of measure was thickness (i.e., 0.001 inches).

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,



J. F. Oesch
PLANT MANAGER

TCB
Attachment

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: REB
BMW
PFF
RML
RBR

Ohio EPA Z 055 522 326
Chief, Division of Solid and Hazardous Waste
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43268-0149

Ohio EPA Z 055 522 327
Division of Hazardous Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Ohio EPA Z 055 522 328
Supervisor, division of Solid and Infectious Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.
Amsted Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

Mahoning County Health District Z 055 522 329
Chief, Solid Waste Program
2801 Market Street
Youngstown, Ohio 44507-1649
Attn: R. D. Setty



JOHN OESCH
PLANT MANAGER

American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150

FAX NO. (216) 821-4568

July 03, 1995

RECEIVED

JUL 07 1995

**OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V**

**CERTIFIED LETTER
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Barbara Mazur

Z 055 522 324

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

Z 055 522 325

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

Progress Report # 13

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

5. After implementation of the Alliance Closure Plan, only in the event that clean closure cannot be achieved, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Alliance Post Closure Plan in accordance with the requirements of 40 C.F.R. # 265.117 through 265.120 and Ohio Admin. Code # 3745-66-17 through 20. If Ohio EPA does not approve the Alliance Post Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or Modified Alliance Post-Closure Plan, in accordance with 40 C.F.R. # 265.118 (d) (4) and (f) and Ohio Admin.. Code # 3745-66-18 (D) (4) and (F). Immediately upon receipt of final approval or modification of the Alliance Post-Closure Plan by Ohio EPA, Defendant shall implement such Plan.

In Mr. John F. Oesch's letter of May 10, 1995, American Steel Foundries formally submitted the "ELECTRIC ARC FURNACE BAGHOUSE CLOSURE CERTIFICATION REPORT" to the U.S. EPA and the Ohio EPA.

Mr. John Palmer from the Northeast District Office, Ohio EPA, inspected the Electric Arc Furnace Baghouse Closure Unit site at the Alliance Plant of American Steel Foundries on June 14, 1995.

In a June 21, 1995 letter from Mr. John Palmer, Environmental Specialist, Ohio EPA to Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries, John acknowledged receipt of the Closure Certification Report the Electric Arc Furnace Baghouse.

D. SEBRING FACILITY -Closure and Post Closure Requirements:

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Admin. Code # 3745-66-12(D)(4)

As an attachment to a February 27, 1995 letter, Mr. John Oesch, Plant Manager, American Steel Foundries, submitted a February 1995 revision of the Surcharge and Settlement Plan for Ohio EPA review.

On March 04, 1995 the initial phase of the construction work for the Surcharge and Settlement Plan was completed at the Sebring Landfill.

In a March 07, 1995 correspondence from Mr. John Palmer, Environmental Specialist, Ohio EPA, to Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries, John asked for clarification of details for the Sebring Landfill Surcharge and Settlement Plan.

On March 27, 1995 in a letter to Mr. John Palmer, Ohio EPA, Northeast District Office, Ms. B. M. Wellman, American Steel Foundries responded to Mr. John Palmer's March 07, 1995 request.

Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries, responded to Mr. John Palmer's March 7, 1995 correspondence of concerns in a March 27, 1995 letter.

In an April 4, 1995 letter to Ms. B. M. Wellman of American Steel Foundries, Mr. John Palmer from Ohio EPA acknowledged receipt of the March 27, 1995 submittal.

In an April 18, 1995 letter from Roy F. Weston Inc., Mr. Gary Deigan, Principal Project Manager, submitted to Mr. John Palmer of the Ohio EPA the Surcharge and Settlement Monitoring - Monthly Report for the April 5, 1995 survey for American Steel Foundries.

Mr. John Palmer, Ohio EPA acknowledged receipt of the April 18, 1995 submittal in a letter to Ms. B. M. Wellman from American Steel Foundries in an April 27, 1995 letter.

On April 27, 1995 a meeting was held at the Alliance Plant of American Steel Foundries with representatives of the Ohio EPA Columbus Office and the Northeast District Office. Also included in the discussions were representatives from Roy F. Weston Inc., American Steel Foundries' consultant.

Topics of discussion in the April 27, 1995 meeting included the Following:

1. A preliminary review of the Revised Sebring Landfill Closure Plan.
2. December Groundwater Sample Report
3. Revisions to Groundwater Monitoring Well program
4. Surcharge and Settlement Plan activities
5. Plans for Separation Berm Construction
6. A site review

In a May 16, 1995 letter from Roy F. Weston Inc., Mr. Gary Deigan, Principal Project Manager, submitted to Mr. John Palmer of the Ohio EPA the Surcharge and Settlement Monitoring - Monthly Report for the May 8, 1995 survey for American Steel Foundries.

Mr. John Palmer, Ohio EPA acknowledged receipt of the May 16, 1995 submittal in a letter to Ms. B. M. Wellman from American Steel Foundries in a May 19, 1995 letter.

In a June 13, 1995 telefax From Mr. John Palmer, Ohio EPA to Ms. B. M. Wellman, American Steel Foundries, John requested additional information about to the separation berm construction.

In a June 13, 1995 letter from Mr. Gary Deigan of Roy F. Weston Inc. for American Steel Foundries, four of the concerns from Mr. Palmer's Telefax were addressed with attached construction specifications. Comment No. 5 of Mr. Palmer's telefax will to be addressed under separate cover.

In a June 13, 1995 letter from Roy F. Weston Inc., Mr. Gary Deigan, Principal Project Manager, submitted to Mr. John Palmer of the Ohio EPA the Surcharge and Settlement Monitoring - Monthly Report for the June 7, 1995 survey for American Steel Foundries.

Mr. John Palmer, Ohio EPA acknowledged receipt of the June 13, 1995 submittal in a letter to Ms. B. M. Wellman from American Steel Foundries in a June 15, 1995 letter.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.

6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

In an April 4, 1995 letter subtitled "Groundwater Sampling Report Response to Comments", Mr. John F. Oesch, Plant Manager, American Steel Foundries responded to Mr. John Palmer's March 6, 1995 letter to Ms. B. M. Wellman that requested comments from the June 1994 sampling event report.

Mr. Palmer from the Ohio EPA acknowledged receipt of the "1994 Interim Status Supplementary Annual Report Forms" in an April 20, 1995 letter to Ms. B. M. Wellman at American Steel Foundries.

In a May 26, 1995 letter Mr. T. C. Bradway from American Steel Foundries asked Mr. Joseph Amabeli, Waste water Treatment Coordinator, Alliance City Water Department for permission to discharge to the sanitary sewer purge and well development water from the March 1995 drilling and sampling event at the Sebring Landfill.

Mr. Amabeli granted permission to discharge the purge and development water from the March 1995 event in his June 2, 1995 response to the May 26, 1995 request.

The semiannual groundwater monitoring well sampling report is currently being reviewed for submittal in the very near future.

The next sampling event is tentatively scheduled for the week of September 18, 1995.

TEST RESULTS AND SAMPLING SUMMARY

American Steel Foundries plans to monitor each load of EAF dust with the EPA Toxic Characteristic Leaching Procedure (TCLP) test for metals for an indefinite period.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

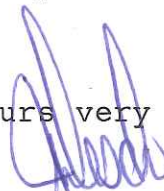
ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,


J. F. Oesch
PLANT MANAGER

TCB
Attachment

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: REB
BMW
PFF
RML
RBR

Ohio EPA **Z 055 522 326**
Chief, Division of Solid and Hazardous Waste
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43268-0149

Ohio EPA **Z 055 522 327**
Division of Hazardous Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Ohio EPA **Z 055 522 328**
Supervisor, division of Solid and Infectious Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.
Amsted Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

Mahoning County Health District **Z 055 522 329**
Chief, Solid Waste Program
2801 Market Street
Youngstown, Ohio 44507-1649
Attn: R. D. Setty

C:\WP51\HAZWASTE\USVAMSTD.TB6

ATTACHMENT "A"

RESAMPLE SAMPLE ANALYSIS REQUEST FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 033095A

BOX NO. 116

Request Submitted by: T.C. BRADWAY

Date Submitted: 3/30/95

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 3/30/95 Time of Sampling: Composite AM/PM

Sampler's Name: T.C. BRADWAY

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature: T.C. Bradway

Witness's Name:

Title and Affiliation of Witness:

Witness's Signature:

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 04/11/95
Envirite Waste ID#: CS1373

Sample Collection Date: 03/30/95
Date Analysis Completed: 04/04/95

Waste Description: EAF Furnace Dust

BOX #: 116

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.6 S.U.
Total CN (As Received)	0.53 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	7.8 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	5.0 mg/L
TCLP Mercury	<0.008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.020 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QA/QC Coordinator

cc: File
TSR:

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume: _____

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 062895A BOX NO. 115

Request Submitted by: T.C. BRADWAY

Date Submitted: 6/28/95

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 6/28/95 Time of Sampling: Composite AM/PM

Sampler's Name: T.C. BRADWAY

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature: T.C. Bradway

Witness's Name: _____

Title and Affiliation of Witness: _____

Witness's Signature: RECD SAMPLE BOX 115 6-28-95 JMB

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume: _____

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 060795 A BOX NO. 116

Request Submitted by: T.C. BRADWAY Date Submitted: 6/7/95

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 6/7/95 Time of Sampling: Composite AM/PM
Sampler's Name: T.C. BRADWAY
Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES
Sampler's Signature: T.C. Bradway
Witness's Name: _____
Title and Affiliation of Witness: REC'D SAMPLE 6/7/95 913
Witness's Signature: Paul M. White ENVIRITE CORP

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION**CERTIFICATION ANALYSIS REPORT**

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 06/16/95
Envirite Waste ID#: CS1373

Sample Collection Date: 06/07/95
Date Analysis Completed: 06/12/95

Waste Description: EAF Furnace Dust

BOX #: 116

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.6 S.U.
Total CN (As Received)	0.52 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.4 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	5.5 mg/L
TCLP Mercury	0.0064 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QA/QC Coordinator

cc: File

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

ENVIRITE CORPORATION**CERTIFICATION ANALYSIS REPORT**

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 06/01/95
Envirite Waste ID#: CS1373

Sample Collection Date: 05/24/95
Date Analysis Completed: 05/30/95

Waste Description: EAF Furnace Dust BOX #: 111

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.5
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.9 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	12.0 mg/L
TCLP Mercury	0.0062 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QA/QC Coordinator

cc: File
TSR: tmc

FAX 6/1/95	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY
SAMPLE NO. 5/24/95 BOX NO. 111

Request Submitted by: T.C. BRADWAY

Date Submitted: 5/24/95

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 5/24/95 Time of Sampling: Composite AM/PM

Sampler's Name: T.C. BRADWAY

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature: T.C. Bradway

Witness's Name:

Title and Affiliation of Witness: RECD SAMPLE 5/24/95 JTB

Witness's Signature: x John S. Miller

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY
SAMPLE NO. 050595 AA BOX NO. 115

Request Submitted by: T.C. BRADWAY

Date Submitted: 5/5/95

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 5/5/95 Time of Sampling: Comp. AM/PM

Sampler's Name: T.C. BRADWAY

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature: T.C. Bradway

Witness's Name:

Title and Affiliation of Witness: REC'D SAMPLE 5/5/95 X Jim A. Dills

Witness's Signature: JAD

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION
CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 05/16/95
Envirite Waste ID#: CS1373

Sample Collection Date: 05/05/95
Date Analysis Completed: 05/11/95

Waste Description: EAF Furnace Dust

BOX #: 115

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	7.3 S.U.
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	5.6 mg/L
TCLP Chromium	0.14 mg/L
TCLP Lead	4.9 mg/L
TCLP Mercury	0.0031 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QA/QC Coordinator

cc: File

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 041895A

BOX NO. 123

Request Submitted by: T.C. BRADWAY

Date Submitted: 4/18/95

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 4/18/95

Time of Sampling: Comp AM/PM

Sampler's Name: T.C. BRADWAY

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature: T.C. Bradway

Witness's Name:

Title and Affiliation of Witness: REC'D SAMPLE 4-18-95 X Tom a W M 4-18-95

Witness's Signature: JB

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 05/02/95
Envirite Waste ID#: CS1373

Sample Collection Date: 04/18/95
Date Analysis Completed: 04/24/95

Waste Description: EAF Furnace Dust BOX #: 123

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.5 S.U.
Total CN (As Received)	0.51 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	9.8 mg/L
TCLP Chromium	1.4 mg/L
TCLP Lead	1.8 mg/L
TCLP Mercury	0.0029 mg/L
TCLP Nickel	2.0 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QA/RC Coordinator

cc: File

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801



JOHN OESCH
PLANT MANAGER

American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 822-6150

FAX NO. (216) 821-4568

RECEIVED

MAY 30 1995

May 10, 1995

**OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V**

**CERTIFIED LETTER
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Barbara Mazur

Z 055 522 302

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

Z 055 522 303

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

ELECTRIC ARC FURNACE BAGHOUSE UNIT CLOSURE CERTIFICATION REPORT

This submittal is intended to meet the progress report requirements of Section X of the Consent Decree and the reporting requirements of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

5. After implementation of the Alliance Closure Plan, only in the event that clean closure cannot be achieved, Defendant shall submit to Ohio EPA, with a copy to U. S. EPA, a Alliance Post-Closure Plan in accordance with the requirements of 40 C.F.R. §§ 265.117 through 265.120 and Ohio Admin. Code §§3745-66-17 through 20. If the Ohio EPA does not approve the Alliance Post-Closure Plan, Defendant shall submit to Ohio EPA, with copy to U. S. EPA, a revised or modified Alliance Post-Closure Plan, in accordance with 40 C.F.R. § 265.118(d) (4) and (f) and Ohio Admin. Code § 3745-66-18 (D) (4) and (F). Immediately upon receipt of final approval or modification of the Alliance Post-Closure Plan by Ohio EPA, Defendant shall implement such Plan.

-1-

Please find enclosed the Closure Certification Statement and Report for the Electric Arc Furnace (EAF) Baghouse Closure at the American Steel Foundries facility, located in Alliance, Ohio. ASF believes that this closure is protective of human health and the environment. The extent of contamination, both areal and vertical have been determined and contaminated soils have been removed to the extent practicable. Closure was completed with the placement of clean backfill in the excavation and construction of a concrete pad on the ground surface. The placement of the concrete will minimize the infiltration of surface water into the former excavation, thus minimizing potential for migration of any remaining hazardous waste constituents. Further, routes for dermal, ingestion and inhalation exposure have been eliminated.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

BMW

Yours very truly,


J. F. Oesch
PLANT MANAGER

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: BMW
JW
REB
RML
RBR

Ohio EPA Z 055 522 304
Chief, Division of Hazardous Waste Management
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43268-0149

Ohio EPA Z 055 522 305
Division of Hazardous Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Ohio EPA Z 055 522 306
Supervisor, division of Solid and Infectious Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.
Amsted Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

Mahoning County Health District Z 055 522 307
Chief, Solid Waste Program
2801 Market Street
Youngstown, Ohio 44507-1649
Attn: R.D.Setty



JOHN OESCH
PLANT MANAGER

American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 821-6150
FAX NO. (216) 821-4568

April 04, 1995

RECEIVED
APR 12 1995

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

**CERTIFIED LETTER
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Barbara Mazur

Z 055 522 278

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

Z 055 522 279

Gentlemen:

UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)

Progress Report # 12

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

5. After implementation of the Alliance Closure Plan, only in the event that clean closure cannot be achieved, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Alliance Post Closure Plan in accordance with the requirements of 40 C.F.R. # 265.117 through 265.120 and Ohio Admin. Code # 3745-66-17 through 20. If Ohio EPA does not approve the Alliance Post Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or Modified Alliance Post-Closure Plan, in accordance with 40 C.F.R.# 265.118 (d) (4) and (f) and Ohio Admin.. Code # 3745-66-18 (D) (4) and (F). Immediately upon receipt of final approval or modification of the Alliance Post-Closure Plan by Ohio EPA, Defendant shall implement such Plan.

Closure of the Electric Arc Furnace Baghouse Waste Management Unit was undertaken during our plant vacation shutdown in the first two weeks of August 1994. Excavation was performed to the base of the foundations in the entire unit in order to attempt clean closure. A concrete slab was poured over the back filled excavation during the third week of August and a documentation of closure was prepared for submittal in early October.

In accordance with Mr. John Palmer's instructions to Ms. Bernadette Wellman at ASF, a Closure Certification Report has been prepared in accordance with Ohio Administrative Code and the most recent RCRA Closure Guidance Document in addition to the EAF Closure Activity Report submitted on October 12, 1994. The document is currently undergoing final review prior to submittal.

D. SEBRING FACILITY -Closure and Post Closure Requirements:

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Admin. Code # 3745-66-12(D)(4)

In a December 09, 1994 letter, Mr. John Oesch, Plant Manager, American Steel Foundries, formally submitted the new Sebring Landfill Closure Plan.

Mr. John Oesch, Plant Manager, American Steel Foundries, formally submitted the new Sebring Landfill Closure Plan Closure Cost Estimate in a December 16, 1994 letter.

In a December 19, 1994 letter, Mr. John Oesch, Plant Manager, American Steel Foundries, formally submitted the Surcharge and Settlement Monitoring Plan for the new Sebring Landfill.

On January 20, 1995 Mr. John Palmer, Environmental Specialist, Ohio EPA, acknowledged receipt of the Landfill Closure Plan in a letter to Mr. Terry Bradway, Environmental Manager, American Steel Foundries.

On January 12, 1995 a progress review meeting was held at the Ohio EPA Northeast District Office in Twinsburg, Ohio. ASF requested the meeting to discuss the progress in all areas of concern in the Consent Decree and Ohio Consent Order. Those in attending included Mr. John Palmer from Ohio EPA, Ms. B. M. Wellman and Mr. T. C. Bradway from American Steel Foundries.

A revision to Schedule 3.6, page 18 of the Landfill Closure Plan, was submitted with a January 20, 1995 letter from Mr. John Oesch, Plant Manager, American Steel Foundries.

On February 09, 1995 construction work for the initial phase of the Surcharge and Settlement Plan was begun at the Sebring Landfill.

On February 22, 1995 Mr. John Palmer and Mr. Eric Adams visited the Sebring Landfill to view the initial construction phase of the Surcharge and Settlement Plan activity and to review the proposed locations of the additional monitoring wells.

As an attachment to a February 27, 1995 letter, Mr. John Oesch, Plant Manager, American Steel Foundries, submitted a February 1995 revision of the Surcharge and Settlement Plan for Ohio EPA review.

On March 04, 1995 the initial phase of the construction work for the Surcharge and Settlement Plan was completed at the Sebring Landfill.

In a March 07, 1995 correspondence from Mr. John Palmer, Environmental Specialist, Ohio EPA, to Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries, John asked for clarification of details for the Sebring Landfill Surcharge and Settlement Plan.

On March 27, 1995 in a letter to Mr. John Palmer, Ohio EPA, Northeast District Office, Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries responded to Mr. John Palmer's request for clarification of details.

Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries, responded to Mr. John Palmer's March 7, 1995 correspondence of concerns in a March 27, 1995 letter.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a

Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.

4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.

5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.

6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

In a December 05, 1994 Letter subtitled "Sampling Report No. 4" from Mr. John Oesch, Plant Manager, American Steel Foundries submitted the sampling report for the September 14 and 15, 1994 sampling of the groundwater monitoring wells at the Sebring Landfill.

The City of Alliance Department of Waste Water Treatment gave ASF approval to discharge to the sanitary sewer purge water from the September 1994 sampling of ground water sampling wells at the Sebring Landfill in a December 13, 1994 letter from Joseph Amabeli, Wastewater Coordinator to Terry Bradway.

In a December 19, 1994 letter titled "Groundwater Sampling Report Response to Comments", Mr. John F. Oesch, Plant Manager, American Steel Foundries responded to Mr. John Palmer's November 23, 1994 letter covering the "1993 Supplementary Annual Report" notice of deficiencies.

In a December 21, 1994 letter titled "Groundwater Sampling Report Response to Comments", Mr. John F. Oesch, Plant Manager, American Steel Foundries responded to Mr. John Palmer's November 23, 1994 letter covering the June 28, 1994 notice of deficiencies from Mr. John Palmer, Ohio EPA.

Mr. John Palmer Acknowledged receipt of documents addressing ground water issues in a December 27, 1994 correspondence to Mr. T. C. Bradway.

A copy of the Groundwater Quality Assessment for the Sebring Facility was included as an appendix of the New Landfill Closure Plan that was submitted by Mr. John F. Oesch's letter of December 09, 1994. The document has been revised to reflect changes requested in both of Mr. John Palmer's letters of November 23, 1994. The revised document was submitted in a January 06, 1995 letter by Mr. John F. Oesch, Plant Manager, American Steel Foundries.

In a January 17, 1995 letter from Mr. John Palmer, Environmental Specialist, Ohio EPA to Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries the Ohio EPA acknowledged receipt of the Ground Water Quality Assessment Plan.

In a February 14, 1995 letter, Mr. John Palmer formally informed Ms. Wellman that the Ohio EPA was going to perform a "Comprehensive Ground Water Monitoring Evaluation" during our next well sampling event on March 21, 1995.

Messrs. John Palmer and Eric Adams of the Ohio EPA gave approval for new well locations in accordance with the Proposed Groundwater Sampling Plan during a telephone conversation on February 17, 1995 with Terry Bradway from ASF.

In a February 28, 1995 letter, Mr. John F. Oesch, Plant Manager, American Steel Foundries submitted a copy of the GRITS/STAT data a potentiometric map in accordance with Mr. John Palmer's June 28, 1994 evaluation of groundwater data submission from his letter of December 27, 1994.

On March 06, 1995 Mr. John Palmer, Ohio EPA acknowledged receipt of the February 28, 1995 submittals in a letter to Ms. B. M. Wellman.

Mr. John Palmer from the Northeast District Office of the Ohio EPA responded to the June 15 through 17 sampling event of the ground water monitoring wells in a March 06, 1995 letter to Ms. B. M. Wellman at American Steel Foundries.

The next sampling event is tentatively scheduled for the week of September 18, 1995.

TEST RESULTS AND SAMPLING SUMMARY

American Steel Foundries plans to monitor each load of EAF dust with the EPA Toxic Characteristic Leaching Procedure (TCLP) test for metals for an indefinite period.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

The following waste streams were recently sampled and are reported as attachment "B":

1. Spent Foundry Sand
2. Floor Sweepings
3. Refractory Brick
4. Broken Core Butts
5. Dewatered Clarifier Sludge
6. Broken Fluorescent Light Bulbs
7. Kerosene, Diesel Fuel and Oil
8. Water & Oil
9. Mineral Spirits, Coolant and Water
10. Waste Oil


ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,


J. F. Oesch
PLANT MANAGER

TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: BMW/RSW
JW
RML
RBR

Ohio EPA Z 055 522 280
Chief, Division of Solid and Hazardous Waste
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43268-0149

Ohio EPA Z 055 522 281
Division of Hazardous Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Ohio EPA Z 055 522 282
Supervisor, division of Solid and Infectious Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.
Amsted Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

P. C. Schillawski Z 055 522 283
Squire Sanders & Dempsey
4900 Society Center
127 Public Square
Cleveland, Ohio 44114-1304

Mahoning County Health District Z 055 522 284
Chief, Solid Waste Program
2801 Market Street
Youngstown, Ohio 44507-1649
Attn: R.D.Setty

ATTACHMENT "A"

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume: _____

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 033095A

BOX NO. 116

Request Submitted by: T.C. BRADWAY

Date Submitted: 3/30/95

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 3/30/95 Time of Sampling: Composite AM/PM

Sampler's Name: T.C. BRADWAY

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature: T.C. Bradway

Witness's Name: _____

Title and Affiliation of Witness: REC'D SAMPLE 3-30-95

Witness's Signature: John M. [Signature]

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION**CERTIFICATION ANALYSIS REPORT****American Steel Foundries**

1001 E. Broadway Street

Alliance, Ohio 44601

Report Date: 03/23/95
Envirite Waste ID#: CS1373Sample Collection Date: 03/16/95
Date Analysis Completed: 03/20/95

Waste Description: EAF Furnace Dust

BOX #: 117

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.6 S.U.
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.0 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	2.3 mg/L
TCLP Mercury	0.0026 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.010 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/RC Coordinator

cc: File

TSR:

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

ENVIRITE CORPORATION**CERTIFICATION ANALYSIS REPORT**

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 03/07/95
Envirite Waste ID#: CS1373

Sample Collection Date: 02/28/95
Date Analysis Completed: 03/03/95

Waste Description: EAF Furnace Dust

BOX #: 111

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.6 S.U.
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.3 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	0.70 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	0.80 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QA/RQ Coordinator

cc: File
TSR:

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 022895 A

BOX NO. 111

Request Submitted by: T.C. BRADWAY

Date Submitted: 2/28/95

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 2/28/95 Time of Sampling: Composite AM/PM

Sampler's Name: T.C. BRADWAY

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature: T.C. Bradway

Witness's Name:

Title and Affiliation of Witness:

Witness's Signature:

ENVCHCDY.EAF

John L. McDowell

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION
CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 02/08/95
Envirite Waste ID#: CS1373

Sample Collection Date: 02/03/95
Date Analysis Completed: 02/07/95

Waste Description: EAF Furnace Dust BOX #: 117

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.5 S.U.
Total CN (As Received)	1.1 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.8 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	3.24 mg/L
TCLP Mercury	0.0050 mg/L
TCLP Nickel	<0.10 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QARC Coordinator

cc: File
TSR:

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 020395A

BOX NO. 117

Request Submitted by: T.C. BRADWAY

Date Submitted: 2/3/95

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 2/3/95 Time of Sampling: Composite AM/PM

Sampler's Name: T.C. BRADWAY

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature: T.C. Bradway

Witness's Name:

Title and Affiliation of Witness: REC'D SAMPLE 2/3/95 X J. B. Bury 2-3-95

Witness's Signature: J. B. Bury

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.



ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: February 21, 1995
Envirite Waste ID#: CS1373

Sample Collection Date: 02/15/95
Date Analysis Completed: 02/19/95

Waste Description: EAF Furnace Dust

BOX #: 116

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.5 S.U.
Total CN (As Received)	0.51 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	0.32 mg/L
TCLP Chromium	0.18 mg/L
TCLP Lead	<0.64 mg/L
TCLP Mercury	0.0021 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QA/QC Coordinator

cc: File
TSR:

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 021595A

BOX NO. 116

Request Submitted by: T. C. BRADWAY

Date Submitted: 2/15/95

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 2/15/95 Time of Sampling: 2:00 PM AM/PM
Sampler's Name: T. C. BRADWAY
Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES
Sampler's Signature: T.C. Bradway
Witness's Name: [Signature]
Title and Affiliation of Witness: REC'D 2-15-95 - [Signature]
Witness's Signature:

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION**CERTIFICATION ANALYSIS REPORT**

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 01/24/95
Envirite Waste ID#: CS1373

Sample Collection Date: 01/19/95
Date Analysis Completed: 01/23/95

Waste Description: EAF Furnace Dust BOX #: 111

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.6
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.2 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	5.9 mg/L
TCLP Mercury	0.0025 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QA/RC Coordinator

cc: File

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

ENVIRITE CORPORATION**CERTIFICATION ANALYSIS REPORT**

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 01/11/95
Envirite Waste ID#: CS1373

Sample Collection Date: 12/28/94
Date Analysis Completed: 01/06/95

Waste Description: EAF Furnace Dust

BOX #: 116

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.6
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.2 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	2.0 mg/L
TCLP Mercury	0.0014 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Lyn Hawkins
QA/QC Coordinator

cc: File
TSR: tmc

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 122894 A BOX NO. 116

Request Submitted by: T.C. BRADWAY

Date Submitted: 12/28/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 12/28/94 Time of Sampling: Composite AM/PM
Sampler's Name: T.C. BRADWAY
Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES
Sampler's Signature: [Signature]
Witness's Name: [Signature]
Title and Affiliation of Witness:
Witness's Signature:

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.



ENVIRITE CORPORATION**CERTIFICATION ANALYSIS REPORT**

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 12/22/94
Envirite Waste ID#: CS1373

Sample Collection Date: 12/16/94
Date Analysis Completed: 12/20/94

Waste Description: EAF Furnace Dust BOX #: 142

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.4
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.5 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	<0.16 mg/L
TCLP Mercury	0.0042 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.010 mg/L
TCLP Silver	0.40 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/QC Coordinator

cc: File
TSR: tmc

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

RECEIVED DEC 16 1994

COP 10:42

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES

Facility Address: 1001 E. BROADWAY ST.

ALLIANCE

OHIO

44601

City

State

ZIP

Stream Number:

CS1373

Date Results Needed: 7 TO 10 DAYS

Waste Code:

D006, D008

Frequency: EACH BOX

Volume:

Generator's Description / Identification of Waste:

EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO.

BOX NO.

142

Request Submitted by: T.C. BRADWAY

Date Submitted: 12/16/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling:

12/16/94

Time of Sampling: COMPOSITE AM/PM

Sampler's Name:

T.C. BRADWAY

Title and Affiliation of Sampler:

ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature:

Witness's Name:

P. COOK

Title and Affiliation of Witness:

RECEIVED BY P. COOK 12-16-94

Witness's Signature:

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRTE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO.

BOX NO. 142

Request Submitted by: T.C. BRADWAY

Date Submitted: 12/16/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 12/16/94

Time of Sampling: Composite AM/PM

Sampler's Name: T.C. BRADWAY

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature:

Witness's Name:

Title and Affiliation of Witness: RECEIVED BY P. COOK 12-16-94

Witness's Signature:

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.



ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 12/08/94
Envirite Waste ID#: CS1373

Sample Collection Date: 11/28/94
Date Analysis Completed: 12/06/94

Waste Description: EAF Furnace Dust BOX #: 120

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.7 S.U.
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.1 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	1.7 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QA/QC Coordinator

cc: File
TSR:

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

WASTE APPROVAL FORM

ATTACHMENT "B"

Date : 12/15/94
BFI Location : Willowcreek Landfill
BFI Initiator : Casanta, Al
Generator : American Steel Foundries
Generator Location : Alliance, OH
WCD Number : AB51187
BFI Number : 202144

WASTE DESCRIPTION: Brick, Refractory

SAFETY PRECAUTIONS: Avoid Skin and Eye Contact.

RECOMMENDED MANAGEMENT: Direct Burial

Facility... Glenwillow Landfill
Northern Ohio Landfill
Willowcreek Landfill
Ottawa Landfill
Mahoning Landfill

COMMENTS:

WCD.updated December 2, 1994.

This waste has the potential to cause dusting problems.

The following items were received by the Corporate Waste Approval Group:

- a. Analytical data from DeYor MetPath Laboratories
- b. Chain of Custody

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above.

This waste stream has been assigned BFI Waste Code: OH/217;218;219;220;855/960212/202144

Corporate Waste Approval Group



Diana L. Lasco

Technical Representative



Waste Systems™

BROWNING-FERRIS INDUSTRIES

Spent Refractory

WCD No. AB

51157

OH 217, 218, 219, 940012, 202144
BFI WASTE CODE 202,855

WASTE APPROVAL REQUEST

BFI to complete this area.

BFI Initiator: Al Casenta
Location: Willow Creek / Massillon
Company Number: 219 / 611
Telephone: (216) 947-2548
Fax: (216) 947-2774
Date: Dec 2, 1994

Action Requested: ☐ New Waste Approval
☒ Up-Date Approval - Previous Number: 202144
Disposal Site Requested: 217-218-219-220-855
Company Number: " " " "
Management Method Requested: ☒ Landfill ☒ Hauling
☐ Other

WASTE CHARACTERIZATION DATA SPECIAL WASTE

IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED.

1. GENERATOR INFORMATION

a) Generator's Name: AMERICAN STEEL FOUNDRIES
b) Generating Facility's Address: 1001 E. BROADWAY ST.
City: ALLIANCE State: OH Zip: 44601
c) Generator's Representative: TERRY C. BROADWAY
Title: ENVIRONMENTAL MANAGER
Telephone: (216) 823-6150 Ext 206
Fax: (216) 821-4568
d) Emergency/Information Contact:
Title:
Telephone: ()

e) State/Provincial/Local Registration No.: N/A
Generator's EPA Id. No.: OH0981090418
Industry Description/SIC Code: 3325
f) Customer's Name:
g) Customer's Mailing Address:
City: State: Zip:
h) Representative:
Telephone: ()
Fax: ()

2. GENERAL WASTE STREAM INFORMATION

a) Name/Description of The Waste: SPENT REFRACTORY FROM FURNACE AND LADLES
b) Process Generating Waste: MELTING STEEL OPERATION FOR STEEL CASTINGS
c) Is this a treatment residue of a waste which was previously a restricted hazardous waste? ☐ Yes ☒ No
If yes, describe the waste and the process generating the waste prior to treatment.
d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Regulations? ☐ Yes ☒ No
If yes, enter the Waste Identification Number if one has been assigned:
e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State, Provincial, or local Regulations?
☒ Yes ☐ No If yes, enter Waste Identification Number: NA
f) Recommended personal protection equipment and special handling procedures:
g) Anticipated Volume: 30 ☐ Cubic Yards ☒ Tons ☐ Gallons ☐ Cubic Meters ☐ Tonnes(metric)
Other Per: ☐ Year ☐ Month ☒ Week ☐ Day ☐ One Time ☐ Other
To be transported in: ☒ Bulk ☐ Drums (type/size) ☐ Other
h) Is a representative sample included? ☒ Yes ☐ No

3. WASTE PROPERTIES AT 72°F

a) Physical State:
☒ Solid ☐ Semi-solid
☐ Powder ☐ Liquid
☐ Combination
b) Layers:
☒ Single-layered ☐ Bi-layered ☐ Multi-layered
c) Colors(s):
Describe Tan, Brown + Black
d) Odor:
Describe
☒ None ☐ Mild ☐ Strong

e) Density Range: ND to
☐ N/D ☐ lbs/gal. ☐ g/cc.
☐ lbs./yd.³ ☐ Kg/m³ ☐ Other
f) Flash Point, °F:
☐ ≤ 72 ☐ 73-100 ☐ 101-140
☐ 141-200 ☐ ≥ 201 ☐ N/A ☒ N/D
g) pH:
☐ ≤ 2 ☐ 2.1 - 5.0 ☐ 5.1 - 9.0
☐ 9.1 - 12.4 ☐ ≥ 12.5 ☐ N/A ☒ N/D

BFI WASTE CODE

4. REACTIVITY	5. THIS WASTE CONTAINS	6. SPECIAL WASTE COMPOSITION																
<p>Note if the waste exhibits any of the following reactive properties:</p> <p> <input type="checkbox"/> Water Reactive <input type="checkbox"/> Acid Reactive <input type="checkbox"/> Alkaline Reactive <input type="checkbox"/> Oxidizer <input type="checkbox"/> Autopolymerizable <input type="checkbox"/> Pyrophoric <input type="checkbox"/> Explosive <input type="checkbox"/> Thermally Sensitive <input type="checkbox"/> Shock Sensitive <input checked="" type="checkbox"/> None of the above </p>	<p>Note if the waste contains any of the following: If any are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6.</p> <table style="width: 100%;"> <tr> <td style="vertical-align: top;"> <input type="checkbox"/> Free Liquids <input type="checkbox"/> Free Cyanide <input type="checkbox"/> Free Sulfide <input type="checkbox"/> Free Ammonia <input type="checkbox"/> Dioxins <input type="checkbox"/> Organic Solvents <input type="checkbox"/> Virgin Oils <input type="checkbox"/> Used Oils </td> <td style="vertical-align: top;"> <input type="checkbox"/> OSHA Substances <input type="checkbox"/> Etiological Agents <input type="checkbox"/> Pathogens <input type="checkbox"/> Biological Materials <input type="checkbox"/> Radioactive Materials <input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761 <input checked="" type="checkbox"/> None of the Above </td> </tr> </table>	<input type="checkbox"/> Free Liquids <input type="checkbox"/> Free Cyanide <input type="checkbox"/> Free Sulfide <input type="checkbox"/> Free Ammonia <input type="checkbox"/> Dioxins <input type="checkbox"/> Organic Solvents <input type="checkbox"/> Virgin Oils <input type="checkbox"/> Used Oils	<input type="checkbox"/> OSHA Substances <input type="checkbox"/> Etiological Agents <input type="checkbox"/> Pathogens <input type="checkbox"/> Biological Materials <input type="checkbox"/> Radioactive Materials <input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761 <input checked="" type="checkbox"/> None of the Above	<p>Concentration ranges are suggested and units must be identified in percentages (%) and/or parts per million (ppm). Attach additional pages if necessary.</p> <table style="width: 100%;"> <thead> <tr> <th style="text-align: left;">Components</th> <th style="text-align: left;">Range Min. / Max.</th> </tr> </thead> <tbody> <tr> <td>REFRACTORY BRICK</td> <td>98 %</td> </tr> <tr> <td>SLAG</td> <td>1.5 %</td> </tr> <tr> <td>SILICA</td> <td>.5 %</td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Components	Range Min. / Max.	REFRACTORY BRICK	98 %	SLAG	1.5 %	SILICA	.5 %						
<input type="checkbox"/> Free Liquids <input type="checkbox"/> Free Cyanide <input type="checkbox"/> Free Sulfide <input type="checkbox"/> Free Ammonia <input type="checkbox"/> Dioxins <input type="checkbox"/> Organic Solvents <input type="checkbox"/> Virgin Oils <input type="checkbox"/> Used Oils	<input type="checkbox"/> OSHA Substances <input type="checkbox"/> Etiological Agents <input type="checkbox"/> Pathogens <input type="checkbox"/> Biological Materials <input type="checkbox"/> Radioactive Materials <input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761 <input checked="" type="checkbox"/> None of the Above																	
Components	Range Min. / Max.																	
REFRACTORY BRICK	98 %																	
SLAG	1.5 %																	
SILICA	.5 %																	

7. TRANSPORTATION INFORMATION

If the waste is a DOT Hazardous Material, complete the following:

Proper USDOT Shipping Name: NA

USDOT Hazard Class: _____ UN or NA Number: _____ CERCLA Reportable Quantity: _____

8. SUPPLEMENTAL INFORMATION

☒ None
 ☐ MSD Sheets
 ☐ Analytical Data
 ☐ Chain of Custody
 ☐ Memo/Letter
 ☐ Waste Composition

Other - describe: _____ No. of Pages: _____

9. GENERATOR'S CERTIFICATION

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omissions of composition or properties exist, that all known or suspected hazards have been disclosed, and that the waste is not a regulated hazardous waste by the USEPA, by an applicable State or Provincial authority, or by any applicable local authority, and does not contain PCBs regulated by TSCA (i.e., 40 CFR 761) or any Provincial authority.

GENERATOR'S AUTHORIZED SIGNATORY as identified in Section 1 (c):

12-2-94	T.C. BRADWAY	T.C. Bradway	ENVIRONMENTAL MANAGER
DATE	PRINT NAME	SIGNATURE	TITLE

REPRESENTATIVE SAMPLE CERTIFICATION

This Section is to be completed by the person obtaining the sample of the above described waste.

I certify that the sample for which analytical data was provided on the waste described above is representative of that waste and was collected and preserved in a manner consistent with accepted technical standards.

Lab sample assigned to: _____ (peel off label)

Collector's Name: T.C. BRADWAY

Signature: T.C. Bradway

Company: AMERICAN STEEL FOUNDRIES

Title: ENVIRONMENTAL MANAGER

Telephone Number: (216) 823-6150 Ext 206

Date Collected: 12-2-94

DATE SAMPLED

TIME

RECEIVED

12/02/94

10:30

12/02/94
REPORTED

/ AMERICAN STEEL FOUNDRIES

5453

00000

12/09/94

	RESULT	REFERENCE LIMIT	UNITS
TCLP EXTRACTION PROC	FINAL PH=5.82		
TCLP METALS & BIAS %			
ARSENIC	<0.5	0.0	5.0
Spike recovery	112		MG/L
			%
BARIUM	<0.5	0.0	100.0
Spike recovery	103		MG/L
			%
CADMIUM	<0.05	0.0	1.0
Spike recovery	105		MG/L
			%
CHROMIUM	<0.05	0.0	5.0
Spike recovery	92		MG/L
			%
SELENIUM	<0.25	0.0	1.0
Spike recovery	94		MG/L
			%
MERCURY	<0.002	0.0	0.2
Spike recovery	107		MG/L
			%
LEAD	<0.2	0.0	5.0
Spike recovery	100		MG/L
			%
SILVER	<0.2	0.0	5.0
Spike recovery	90		MG/L
			%
TCLP SUPPL. METALS			
NICKEL	0.2		MG/L
Spike recovery	95		%
COPPER	<0.05		MG/L
Spike recovery	90		%
TCLP REVIEW			

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846
AS REVISED NOVEMBER 24, 1992 (57FR33114)
REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR



--- DIRECTORS ---

Patrick K. Jaynes Ph.D.
Anthony Nasrallah Ph.D.



7655 Market Street, Suite 2500
Youngstown, Ohio 44512
(216) 758-5788
(800) 385-3396

BFI WASTE SYSTEMS
WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 44201

Reference limit is provided for convenience. It may not apply to every hazard assessment. Be certain correct limit is applied to evaluation.

7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY

BROWNING-FERRIS INDUSTRIES

Location: Willow Creek Client# 623

Billing Control # (Lab use only) 275550

Purchase Order# 2198385

Generator/Prod # American Steel Foundries

LAB ID# 865453 WCD # AB 51187

Waste Description: Refactory

Number of containers _____
Matrix ☐ Soil ☒ Solid ☐ Multiphase ☐ Organic/oil

ANALYSES REQUESTED RUSH ☐ Y ☐ N ☐

- 553 ☒ TCLP Extraction
- 546 ☐ Zero Headspace Extraction
- 548 ☒ Metals + spike recoveries
- 544 ☒ Supplemental metals + spikes (Copper & Nickel)
- 585 ☐ UST Priority Panel (Metals + TPH + Rush Service)
- 578 ☐ Volatiles + spike recoveries
- 582 ☐ Semi-volatiles + spike recoveries
- 581 ☐ Pesticides/Herbicides + spike recoveries
- 1002 ☐ Reactivity Screen
- 1003 ☐ Corrosivity Screen
- 859 ☐ Ignitability
- 511 ☐ Total Petroleum Hydrocarbons (TPH)
- 569 ☐ BETX
- 502 ☐ PCB (sniff)
- ☐ Other _____
- 245 ☒ Signatory Review

APP # 300.00

Sample Taken By:	Date	Time	Company
<u>T.C. Brading</u>	<u>12/2/94</u>	<u>10:30 AM</u>	<u>AMERICAN STEEL FOUNDRIES</u>
Sample Submitted By: _____			
Sample Courtered By: _____			
<u>Al Casanova</u>	<u>12/2/94</u>	<u>4:20 PM</u>	<u>BFI</u>
Sample Received By: _____			
<u>Jou Vinkja</u>	<u>12-2-94</u>	<u>4:30 PM</u>	<u>DeYor Laboratories</u>



WASTE APPROVAL FORM

Date : 12/15/94
BFI Location : Willowcreek Landfill
BFI Initiator : Casanta, Al
Generator : American Steel Foundries
Generator Location : Alliance, OH
WCD Number : AB51185
BFI Number : 202143

WASTE DESCRIPTION: Floorsweepings

SAFETY PRECAUTIONS: Avoid Skin and Eye Contact.

RECOMMENDED MANAGEMENT: Direct Burial

Facility... Glenwillow Landfill
Northern Ohio Landfill
Willowcreek Landfill
Ottawa Landfill

COMMENTS:

WCD updated December 2, 1994.

This waste has the potential to cause dusting problems.

The following items were received by the Corporate Waste Approval Group:

- a. Analytical data from DeYor MetPath Laboratories
- b. Chain of Custody

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above.

This waste stream has been assigned BFI Waste Code: OH/217;218;219;220/970212/202143

Corporate Waste Approval Group

Diana L. Lasco

Technical Representative

WASTE APPROVAL REQUEST

BFI to complete this area.

BFI Initiator: Al Casan Jr
Location: Willowcreek/Kassillon
Company Number: 219 611
Telephone: (216) 947-2548
Fax: (216) 947-2548
Date: Dec 2, 1994

Action Requested: ☐ New Waste Approval
☒ Up-Date Approval - Previous Number: 202143
Disposal Site Requested: 217, 218, 219, 220
Company Number: _____
Management Method Requested: ☒ Landfill ☒ Hauling
☐ Other _____

WASTE CHARACTERIZATION DATA
SPECIAL WASTE

IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED.

1. GENERATOR INFORMATION

a) Generator's Name: AMERICAN STEEL FOUNDRIES
b) Generating Facility's Address: 1001 E. SECONDWAY ST.
City: ALLIANCE State: OH Zip: 44601
c) Generator's Representative: TERRY C. BROADWAY
Title: ENVIRONMENTAL MANAGER
Telephone: (216) 823-6150 EXT 206
Fax: (216) 821-4668
d) Emergency/Information Contact: SAME AS ABOVE
Title: _____
Telephone: () _____

e) State/Provincial/Local Registration No.: N/A
Generator's EPA Id. No.: OH D981090418
Industry Description/SIC Code: 3325
f) Customer's Name: _____
g) Customer's Mailing Address: _____
City: _____ State: _____ Zip: _____
h) Representative: _____
Telephone: () _____
Fax: () _____

2. GENERAL WASTE STREAM INFORMATION

a) Name/Description of The Waste: FLOOR SWEEPINGS
b) Process Generating Waste: SWEEP FLOOR FROM STEEL Foundry OPERATION
c) Is this a treatment residue of a waste which was previously a restricted hazardous waste? ☐ Yes ☒ No
If yes, describe the waste and the process generating the waste prior to treatment. _____
d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Regulations? ☐ Yes ☒ No
If yes, enter the Waste Identification Number if one has been assigned: _____
e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State, Provincial, or local Regulations?
☒ Yes ☐ No If yes, enter Waste Identification Number: N A
f) Recommended personal protection equipment and special handling procedures: NONE
g) Anticipated Volume: 10 ☐ Cubic Yards ☒ Tons ☐ Gallons ☐ Cubic Meters ☐ Tonnes(metric)
Other _____ Per: ☐ Year ☒ Month ☐ Week ☐ Day ☐ One Time ☐ Other _____
To be transported in: ☒ Bulk ☐ Drums (type/size) _____ ☐ Other _____
h) Is a representative sample included? ☐ Yes ☐ No

3. WASTE PROPERTIES AT 72°F

a) Physical State:
☒ Solid ☐ Semi-solid
☐ Powder ☐ Liquid
☐ Combination
b) Layers:
☒ Single-layered ☐ Bi-layered ☐ Multi-layered
c) Colors(s): BLACK WITH GRAYS
Describe _____
d) Odor:
Describe _____
☒ None ☐ Mild ☐ Strong

e) Density Range: ND to _____
☐ N/D ☐ lbs/gal. ☐ g/cc.
☐ lbs./yd.³ ☐ Kg/m³ ☐ Other _____
f) Flash Point, °F:
☐ ≤ 72 ☐ 73-100 ☐ 101-140
☐ 141-200 ☐ ≥ 201 ☐ N/A ☒ N/D
g) pH:
☐ ≤ 2 ☐ 2.1 - 5.0 ☐ 5.1 - 9.0
☐ 9.1 - 12.4 ☐ ≥ 12.5 ☐ N/A ☒ N/D

4. REACTIVITY Note if the waste exhibits any of the following reactive properties: <input type="checkbox"/> Water Reactive <input type="checkbox"/> Acid Reactive <input type="checkbox"/> Alkaline Reactive <input type="checkbox"/> Oxidizer <input type="checkbox"/> Autopolymerizable <input type="checkbox"/> Pyrophoric <input type="checkbox"/> Explosive <input type="checkbox"/> Thermally Sensitive <input type="checkbox"/> Shock Sensitive <input checked="" type="checkbox"/> None of the above	5. THIS WASTE CONTAINS Note if the waste contains any of the following: If any are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6. <div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <input type="checkbox"/> Free Liquids <input type="checkbox"/> Free Cyanide <input type="checkbox"/> Free Sulfide <input type="checkbox"/> Free Ammonia <input type="checkbox"/> Dioxins <input type="checkbox"/> Organic Solvents <input type="checkbox"/> Virgin Oils <input type="checkbox"/> Used Oils </div> <div style="width: 48%;"> <input type="checkbox"/> OSHA Substances <input type="checkbox"/> Etiological Agents <input type="checkbox"/> Pathogens <input type="checkbox"/> Biological Materials <input type="checkbox"/> Radioactive Materials <input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761 <input checked="" type="checkbox"/> None of the Above </div> </div>	6. SPECIAL WASTE COMPOSITION Concentration ranges are suggested and units must be identified in percentages (%) and/or parts per million (ppm). Attach additional pages if necessary. <table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Components</th> <th style="text-align: center;">Range Min. / Max.</th> </tr> </thead> <tbody> <tr> <td><u>SAND</u></td> <td style="text-align: center;"><u>70 %</u></td> </tr> <tr> <td><u>INSULATED SLEEVES</u></td> <td style="text-align: center;"><u>2 %</u></td> </tr> <tr> <td><u>SCRAP STEEL</u></td> <td style="text-align: center;"><u>13 %</u></td> </tr> <tr> <td><u>STEEL GRINDINGS</u></td> <td style="text-align: center;"><u>15 %</u></td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Components	Range Min. / Max.	<u>SAND</u>	<u>70 %</u>	<u>INSULATED SLEEVES</u>	<u>2 %</u>	<u>SCRAP STEEL</u>	<u>13 %</u>	<u>STEEL GRINDINGS</u>	<u>15 %</u>				
Components	Range Min. / Max.															
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<u>SCRAP STEEL</u>	<u>13 %</u>															
<u>STEEL GRINDINGS</u>	<u>15 %</u>															

7. TRANSPORTATION INFORMATION

 If the waste is a DOT Hazardous Material, complete the following:
 Proper USDOT Shipping Name: N/A
 USDOT Hazard Class: _____ UN or NA Number: _____ CERCLA Reportable Quantity: _____

8. SUPPLEMENTAL INFORMATION

☒ None
 ☐ MSD Sheets
 ☐ Analytical Data
 ☐ Chain of Custody
 ☐ Memo/Letter
 ☐ Waste Composition

☐ Other - describe: _____ No. of Pages: _____

9. GENERATOR'S CERTIFICATION

 I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omissions of composition or properties exist, that all known or suspected hazards have been disclosed, and that the waste is not a regulated hazardous waste by the USEPA, by an applicable State or Provincial authority, or by any applicable local authority, and does not contain PCBs regulated by TSCA (i.e., 40 CFR 761) or any Provincial authority.
 GENERATOR'S AUTHORIZED SIGNATORY as identified in Section 1 (c):

12-2-94
DATE

T.C. BRADWAY
PRINT NAME

T.C. Bradway
SIGNATURE

ENVIRONMENTAL MANAGER
TITLE

REPRESENTATIVE SAMPLE CERTIFICATION

 This Section is to be completed by the person obtaining the sample of the above described waste.

 I certify that the sample for which analytical data was provided on the waste described above is representative of that waste and was collected and preserved in a manner consistent with accepted technical standards.

 Lab sample assigned to: _____ (peel off label)
 Collector's Name: T.C. BRADWAY
 Signature: T.C. Bradway
 Company: AMERICAN STEEL FOUNDRIES
 Title: ENVIRONMENTAL MANAGER
 Telephone Number: (216) 823-6150 EXT. 206
 Date Collected: 12/2/94

DATE SAMPLED

TIME

RECEIVED

12/02/94

10:30

12/02/94

REPORTED

AMERICAN STEEL FOUNDRIES

5452

00000

12/09/94

RESULT

REFERENCE LIMIT

UNITS

TCLP EXTRACTION PROC

TCLP METALS & BIAS %

FINAL PH=5.50

ARSENIC

<0.3

0.0

5.0

MG/L

Spike recovery

110

%

BARIUM

<0.5

0.0

100.0

MG/L

Spike recovery

101

%

CADMIUM

<0.05

0.0

1.0

MG/L

Spike recovery

107

%

CHROMIUM

<0.05

0.0

5.0

MG/L

Spike recovery

93

%

SELENIUM

<0.25

0.0

1.0

MG/L

Spike recovery

92

%

MERCURY

<0.002

0.0

0.2

MG/L

Spike recovery

108

%

LEAD

<0.2

0.0

5.0

MG/L

Spike recovery

100

%

SILVER

<0.2

0.0

5.0

MG/L

Spike recovery

91

%

TCLP SUPPL. METALS

NICKEL

0.4

MG/L

Spike recovery

95

%

COPPER

<0.05

MG/L

Spike recovery

90

%

TCLP REVIEW

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846

AS REVISED NOVEMBER 24, 1992 (37FR33114)

REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR

Albert F. Vicinie III

--- DIRECTORS ---

Patrick K. Jaynes Ph.D.

Anthony Nasrallah Ph.D.

DEYOR METPATH
Laboratories
a CORNING Company

7655 Market Street, Suite 2500
Youngstown, Ohio 44512
(216) 758-5788
(800) 365-3396

BFI WASTE SYSTEMS
WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 44201

Reference limit is provided for convenience. It may not apply to every hazard assessment. Be certain correct limit is applied to evaluation.

7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY

BROWNING-FERRIS INDUSTRIES

Location: W. H. H. Creek Client# UN3
 Billing Control # (Lab use only) 275550
 Purchase Order# 2198385
 Generator/Project# American Steel Foundries
 LAB ID# 865452 WCD # AB 31185
 Waste Description: Floor Sweepings
 Number of containers _____
 Matrix Soil ☒ Solid ☐ Multiphase ☐ Organic/oil

ANALYSES REQUESTED

RUSH Y N

- 553 ☒ TCLP Extraction
- 546 ☒ Zero Headspace Extraction
- 548 ☒ Metals + spike recoveries
- 544 ☒ Supplemental metals + spikes (Copper & Nickel)
- 585 ☐ UST Priority Panel (Metals + TPH + Rush Service)
- 578 ☐ Volatiles + spike recoveries
- 582 ☐ Semi-volatiles + spike recoveries
- 581 ☐ Pesticides/Herbicides + spike recoveries
- 1002 ☐ Reactivity Screen
- 1003 ☐ Corrosivity Screen
- 859 ☐ Ignitability
- 511 ☐ Total Petroleum Hydrocarbons (TPH)
- 569 ☐ BETX
- 502 ☐ PCB (soil)
- ☐ Other _____
- 245 ☒ Signatory Review

Approx 300.00

Sample Taken By:	Date	Time	Company
<u>TIC B...</u>	<u>12/2/94</u>	<u>10:30 AM</u>	<u>AMERICAN STEEL FOUNDRIES</u>
Sample Submitted By: _____			
Sample Courtered By: _____			
<u>Al ...</u>	<u>12/2/94</u>	<u>4:20 PM</u>	<u>BFI</u>
Sample Received By: _____			
<u>Jeri Verbyka</u>	<u>12-2-94</u>	<u>4:30</u>	<u>DeYor Laboratories</u>



WASTE APPROVAL FORM

Date : 12/22/94
BFI Location : Willowcreek Landfill
BFI Initiator : Casanta, Al
Generator : American Steel Foundries
Generator Location : Alliance, OH
WCD Number : AB51184
BFI Number : 202142

WASTE DESCRIPTION: Sand, Foundry

SAFETY PRECAUTIONS: Avoid Skin and Eye Contact.

RECOMMENDED MANAGEMENT: Direct Burial

Facility... Glenwillow Landfill
Northern Ohio Landfill
Willowcreek Landfill
Ottawa Landfill
Mahoning Landfill

COMMENTS:

This waste has the potential to cause dusting problems.

The following items were received by the Corporate Waste Approval Group:

- a. Analytical data from DeYor MetPath Laboratories
- b. Chain of Custody

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above.

This waste stream has been assigned BFI Waste Code: OH/217;218;219;220;855/960212/202142

Corporate Waste Approval Group

Diana L. Lasco

Technical Representative

WASTE APPROVAL REQUEST

BFI to complete this area.

BFI Initiator: Al Capantia
Location: Willow Creek / Hossillon
Company Number: 219 611
Telephone: (216) 847-2548
Fax: (216) 847-2124
Date: Dec 2, 1994

Action Requested: ☐ New Waste Approval
☒ Up-Date Approval - Previous Number: 202142
Disposal Site Requested: 217,218,219,220,855
Company Number: " " " "
Management Method Requested: ☒ Landfill ☒ Hauling
☐ Other

WASTE CHARACTERIZATION DATA
SPECIAL WASTE

IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED.

1. GENERATOR INFORMATION

a) Generator's Name: AMERICAN STEEL FOUNDRIES
b) Generating Facility's Address: 1001 E. BROADWAY ST.
City: ALLIANCE State: OH Zip: 44601
c) Generator's Representative: TERRY C. BROADWAY
Title: ENVIRONMENTAL MANAGER
Telephone: (216) 823-6150 Ext 206
Fax: (216) 821-9568
d) Emergency/Information Contact: SAME AS ABOVE
Title: _____
Telephone: () _____

e) State/Provincial/Local Registration No.: N/A
Generator's EPA Id. No.: OH0981090418
Industry Description/SIC Code: 3325
f) Customer's Name: _____
g) Customer's Mailing Address: _____
City: _____ State: _____ Zip: _____
h) Representative: _____
Telephone: () _____
Fax: () _____

2. GENERAL WASTE STREAM INFORMATION

a) Name/Description of The Waste: SPENT FOUNDRY SAND (EXEMPT WASTE)
b) Process Generating Waste: MOLDING OPERATION FOR STEEL FOUNDRY
c) Is this a treatment residue of a waste which was previously a restricted hazardous waste? ☐ Yes ☒ No
If yes, describe the waste and the process generating the waste prior to treatment. _____
d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Regulations? ☐ Yes ☒ No
If yes, enter the Waste Identification Number if one has been assigned: _____
e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State, Provincial, or local Regulations?
☐ Yes ☐ No If yes, enter Waste Identification Number: NA
f) Recommended personal protection equipment and special handling procedures: NONE
g) Anticipated Volume: 300 ☐ Cubic Yards ☒ Tons ☐ Gallons ☐ Cubic Meters ☐ Tonnes(metric)
Other _____ Per: ☐ Year ☐ Month ☒ Week ☐ Day ☐ One Time ☐ Other _____
To be transported in: ☒ Bulk ☐ Drums (type/size) _____ ☐ Other _____
h) Is a representative sample included? ☒ Yes ☐ No

3. WASTE PROPERTIES AT 72°F

a) Physical State:
☒ Solid ☐ Semi-solid
☐ Powder ☐ Liquid
☐ Combination
b) Layers:
☒ Single-layered ☐ Bi-layered ☐ Multi-layered
c) Color(s):
Describe White, Tan, Brown & Black
d) Odor:
Describe _____
☒ None ☐ Mild ☐ Strong

e) Density Range: ND to _____
☐ N/D ☐ lbs/gal. ☐ g/cc.
☐ lbs./yd.³ ☐ Kg/m³ ☐ Other
f) Flash Point, °F:
☐ ≤ 72 ☐ 73-100 ☐ 101-140
☐ 141-200 ☐ ≥ 201 ☒ N/A ☒ N/D
g) pH:
☐ ≤ 2 ☐ 2.1 - 5.0 ☐ 5.1 - 9.0
☐ 9.1 - 12.4 ☐ ≥ 12.5 ☒ N/A ☐ N/D

4. REACTIVITY	5. THIS WASTE CONTAINS	6. SPECIAL WASTE COMPOSITION																		
<p>If the waste exhibits any of the following reactive properties:</p> <p><input type="checkbox"/> Water Reactive</p> <p><input type="checkbox"/> Acid Reactive</p> <p><input type="checkbox"/> Alkaline Reactive</p> <p><input type="checkbox"/> Oxidizer</p> <p><input type="checkbox"/> Autopolymerizable</p> <p><input type="checkbox"/> Pyrophoric</p> <p><input type="checkbox"/> Explosive</p> <p><input type="checkbox"/> Thermally Sensitive</p> <p><input type="checkbox"/> Shock Sensitive</p> <p><input checked="" type="checkbox"/> None of the above</p>	<p>Note if the waste contains any of the following: If any are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6.</p> <table style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> Free Liquids <input type="checkbox"/> Free Cyanide <input type="checkbox"/> Free Sulfide <input type="checkbox"/> Free Ammonia <input type="checkbox"/> Dioxins <input type="checkbox"/> Organic Solvents <input type="checkbox"/> Virgin Oils <input type="checkbox"/> Used Oils </td> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> OSHA Substances <input type="checkbox"/> Etiological Agents <input type="checkbox"/> Pathogens <input type="checkbox"/> Biological Materials <input type="checkbox"/> Radioactive Materials <input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761 <input checked="" type="checkbox"/> None of the Above </td> </tr> </table>	<input type="checkbox"/> Free Liquids <input type="checkbox"/> Free Cyanide <input type="checkbox"/> Free Sulfide <input type="checkbox"/> Free Ammonia <input type="checkbox"/> Dioxins <input type="checkbox"/> Organic Solvents <input type="checkbox"/> Virgin Oils <input type="checkbox"/> Used Oils	<input type="checkbox"/> OSHA Substances <input type="checkbox"/> Etiological Agents <input type="checkbox"/> Pathogens <input type="checkbox"/> Biological Materials <input type="checkbox"/> Radioactive Materials <input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761 <input checked="" type="checkbox"/> None of the Above	<p>Concentration ranges are suggested and units must be identified in percentages (%) and/or parts per million (ppm). Attach additional pages if necessary.</p> <table style="width: 100%;"> <thead> <tr> <th style="text-align: left;">Components</th> <th style="text-align: left;">Range Min. / Max.</th> </tr> </thead> <tbody> <tr> <td>SILICA</td> <td>94 %</td> </tr> <tr> <td>CLAY</td> <td>6 %</td> </tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Components	Range Min. / Max.	SILICA	94 %	CLAY	6 %										
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Components	Range Min. / Max.																			
SILICA	94 %																			
CLAY	6 %																			

7. TRANSPORTATION INFORMATION

If the waste is a DOT Hazardous Material, complete the following:

Proper USDOT Shipping Name: N/A

USDOT Hazard Class: _____ UN or NA Number: _____ CERCLA Reportable Quantity: _____

8. SUPPLEMENTAL INFORMATION

☒ None ☐ MSD Sheets ☐ Analytical Data ☐ Chain of Custody ☐ Memo/Letter ☐ Waste Composition

☐ Other - describe: _____ No. of Pages: _____

9. GENERATOR'S CERTIFICATION

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omissions of composition or properties exist, that all known or suspected hazards have been disclosed, and that the waste is not a regulated hazardous waste by the USEPA, by an applicable State or Provincial authority, or by any applicable local authority, and does not contain PCBs regulated by TSCA (i.e., 40 CFR 761) or any Provincial authority.

GENERATOR'S AUTHORIZED SIGNATORY as identified in Section 1 (c):

12-2-94 T.C. BRADWAY T.C. Bradway Environmental Manager

DATE PRINT NAME SIGNATURE TITLE

REPRESENTATIVE SAMPLE CERTIFICATION

This Section is to be completed by the person obtaining the sample of the above described waste.

I certify that the sample for which analytical data was provided on the waste described above is representative of that waste and was collected and preserved in a manner consistent with accepted technical standards.

Lab sample assigned to: _____ (peel off label)

Collector's Name: T.C. BRADWAY

Signature: T.C. Bradway

Company: AMERICAN STEEL FORGEWORKS

Title: ENVIRONMENTAL MANAGER

Telephone Number: (216) 823-6150 Ext. 206

Date Collected: 12/2/94

WCD#AB51184; SPENT FOUNDRY SAND

94865451

94 865451

DATE SAMPLED

TIME

12/02/94

10:30

RECEIVED

12/02/94

REPORTED

12/19/94

AMERICAN STEEL FOUNDRIES

5451

00000

	RESULT	REFERENCE LIMIT	UNITS
TCLP EXTRACTION PROC ZERO HEADSPACE EXTRT TCLP METALS & BIAS %			
ARSENIC	<0.5	0.0	5.0
Spike recovery	116		%
BARIUM	0.5	0.0	100.0
Spike recovery	99		%
CADMIUM	<0.05	0.0	1.0
Spike recovery	108		%
CHROMIUM	0.08	0.0	5.0
Spike recovery	92		%
SELENIUM	<0.25	0.0	1.0
Spike recovery	94		%
MERCURY	<0.002	0.0	0.2
Spike recovery	108		%
LEAD	<0.2	0.0	5.0
Spike recovery	104		%
SILVER	<0.2	0.0	5.0
Spike recovery	94		%
TCLP SUPPL. METALS			
NICKEL	0.3		MG/L
Spike recovery	95		%
COPPER	<0.05		MG/L
Spike recovery	87		%
TCLP VOA'S & BIAS %			
METHOD NUMBER	8240		
VINYL CHLORIDE	<0.002	0.0	0.2
Spike recovery	103		%
1,1-DICHLOROETHYLENE	<0.002	0.0	0.7
Spike recovery	92		%
METHYL ETHYL KETONE	<1.0	0.0	200
Spike recovery	99		%
CHLOROFORM	<0.002	0.0	6.0
Spike recovery	101		%
CARBON TETRACHLORIDE	<0.002	0.0	0.5
Spike recovery	104		%
BENZENE	<0.002	0.0	0.5
Spike recovery	83		%

FINAL PH=5.40
COMPLETED 12/07/94

--- DIRECTORS ---

Patrick K. Jaynes Ph.D.

Anthony Nasrallah Ph.D.



7655 Market Street, Suite 2500
 Youngstown, Ohio 44512
 (216) 758-5788
 (800) 365-3396

BFI WASTE SYSTEMS
 WILLOWCREEK LANDFILL DISTRICT
 1043 STATE ROUTE 225
 ATWATER OH 44201

Reference limit is provided for convenience. It may not
 apply to every hazard assessment. Be certain correct
 limit is applied to evaluation.

WCD#AB51184; SPENT FOUNDRY SAND

94865451

94 865451

DATE SAMPLED

TIME

12/02/94

10:30

RECEIVED

12/02/94

REPORTED

12/19/94

AMERICAN STEEL FOUNDRIES

5451

00000

	RESULT	REFERENCE LIMIT		UNITS
1,2-DICHLOROETHANE	<0.002	0.0	0.5	MG/L
Spike recovery	100			%
TRICHLOROETHYLENE	<0.002	0.0	0.5	MG/L
Spike recovery	97			%
TETRACHLOROETHYLENE	<0.002	0.0	0.7	MG/L
Spike recovery	92			%
CHLOROBENZENE	<0.002	0.0	100.0	MG/L
Spike recovery	100			%
1,4-DICHLOROBENZENE	<0.002	0.0	7.5	MG/L
Spike recovery	99			%
TCLP BNA'S & BIAS %				
METHOD NUMBER	8270			
CRESOLS	<0.10	0.0	200	MG/L
Spike recovery	79			%
2,4-DINITROTOLUENE	<0.10	0.0	0.13	MG/L
Spike recovery	109			%
HEXACHLOROBENZENE	<0.10	0.0	0.13	MG/L
Spike recovery	126			%
HEXACHLOROBUTADIENE	<0.10	0.0	0.50	MG/L
Spike recovery	96			%
HEXACHLOROETHANE	<0.10	0.0	3.0	MG/L
Spike recovery	82			%
NITROBENZENE	<0.10	0.0	2.0	MG/L
Spike recovery	122			%
PENTACHLOROPHENOL	<0.10	0.0	100.	MG/L
Spike recovery	96			%
PYRIDINE	<0.10	0.0	5.0	MG/L
Spike recovery	80			%
2,4,5-TRICHLOROPHEN	<0.10	0.0	400.	MG/L
Spike recovery	121			%
2,4,6-TRICHLOROPHEN	<0.10	0.0	2.0	MG/L
Spike recovery	86			%
REACTIVITY SCREEN	SAMPLE DISPLAYED REACTIVE SULFIDE AT 4ppm. REACTIVE CYANIDE <2.0 PPM ASTM D5049 METHOD D/D4978 METHOD B			
CORROSIVITY SCREEN	SAMPLE IS NONCORROSIVE, PH = 10.31 ASTM D4980 METHOD B/USEPA 9040			

--- DIRECTORS ---

Patrick K. Jaynes Ph.D.

Anthony Nasrallah Ph.D.



7655 Market Street, Suite 2500
 Youngstown, Ohio 44512
 (216) 758-5788
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BFI WASTE SYSTEMS
 WILLOWCREEK LANDFILL DISTRICT
 1043 STATE ROUTE 225
 ATWATER OH 44201

Reference limit is provided for convenience. It may not apply to every hazard assessment. Be certain correct limit is applied to evaluation.

CLIENT SAMPLE IDENTIFICATION

WCD#AB51184; SPENT FOUNDRY SAND

94865451

LAB ID NO.

94 865451

DATE SAMPLED

12/02/94

TIME

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12/19/94

AMERICAN STEEL FOUNDRIES

5451

00000

RESULT

REFERENCE LIMIT

UNITS

IGNITABILITY TEST

SAMPLE HEATED TO 160F WITHOUT FLASH OR IGNITION.
ASTM D4982 METHOD B/ASTM D93

TCLP REVIEW

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846
AS REVISED NOVEMBER 24, 1992 (57FR55114)
REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR



--- DIRECTORS ---

Patrick K. Jaynes Ph.D.

Anthony Nasrallah Ph.D.



7655 Market Street, Suite 2500
Youngstown, Ohio 44512
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BFI WASTE SYSTEMS
WILLOWCREEK LANDFILL DISTRICT
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(800) 365-3396
(216) 758-5788

DeYor Laboratories Inc.
Southwoods Medical-Health Complex

7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY

BROWNING-FERRIS INDUSTRIES

Location: Carbon Willowcreek Landfill Client# 876 623
Billing Control # (Lab use only) 94-275531
Purchase Order# 855-13634
Generator/Project# REYNOLDS DISPOSAL CO.
LAB ID# 865155 WCD # AB 40293
Waste Description: WWT? SLOPE
Number of containers 4
Matrix Soil ☒ Solid ☐ Multiphase ☐ Organic/oil

ANALYSES REQUESTED

RUSH

Y

(N)

553 ☒ TCLP Extraction
546 ☒ Zero Headspace Extraction
548 ☒ Metals + spike recoveries
544 ☒ Supplemental metals + spikes (Copper & Nickel)
585 ☐ UST Priority Panel (Metals + TPH + Rush Service)
578 ☒ Volatiles + spike recoveries
582 ☒ Semi-volatiles + spike recoveries
581 ☒ Pesticides/Herbicides + spike recoveries
1002 ☐ Reactivity Screen
1003 ☐ Corrosivity Screen
859 ☐ Ignitability
511 ☐ Total Petroleum Hydrocarbons (TPH)
569 ☐ BETX
502 ☐ PCB (soil)
☐ Other
245 ☒ Signatory Review

Sample Taken By:	Date	Time	Company
<u>Richard Hughes</u>	<u>11-30-94</u>	<u>10:15A</u>	<u>Reynolds Disposal Co.</u>
Sample Submitted By:			
<u>Don Lyons</u>	<u>11/30</u>	<u>18:20</u>	<u>BFI - Carbon</u>
Sample Couried By:			
<u>Same</u>			
Sample Received By:			
<u>Dennis Brady</u>	<u>11-30-94</u>	<u>18:20</u>	<u>DeYor Laboratories</u>

7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY

BROWNING-FERRIS INDUSTRIES

 Location: Willowcreek Client# 623

 Billing Control #(Lab use only) 275550

 Purchase Order# 2198385

 Generator/Project# American Steel Foundries

 LAB ID# 865451 WCD # AB 51184

 Waste Description: Spent Foundry Sand (Exempt B1 & J1)

Number of containers

 Matrix Soil ☒ Solid ☐ Multiphase ☐ Organic/oil

ANALYSES REQUESTED

RUSH Y N

- | | | |
|------|-------------------------------------|--|
| 553 | <input checked="" type="checkbox"/> | TCLP Extraction |
| 546 | <input checked="" type="checkbox"/> | Zero Headspace Extraction |
| 548 | <input checked="" type="checkbox"/> | Metals + spike recoveries |
| 544 | <input checked="" type="checkbox"/> | Supplemental metals + spikes (Copper & Nickel) |
| 585 | <input type="checkbox"/> | UST Priority Panel (Metals + TPH + Rush Service) |
| 578 | <input checked="" type="checkbox"/> | Volatiles + spike recoveries |
| 582 | <input checked="" type="checkbox"/> | Semi-volatiles + spike recoveries |
| 581 | <input type="checkbox"/> | Pesticides/Herbicides + spike recoveries |
| 1002 | <input checked="" type="checkbox"/> | Reactivity Screen |
| 1003 | <input checked="" type="checkbox"/> | Corrosivity Screen |
| 859 | <input checked="" type="checkbox"/> | Ignitability |
| 511 | <input type="checkbox"/> | Total Petroleum Hydrocarbons (TPH) |
| 569 | <input type="checkbox"/> | BETX |
| 502 | <input type="checkbox"/> | PCB (soil) |
| | <input type="checkbox"/> | Other |
| 245 | <input checked="" type="checkbox"/> | Signatory Review |

APPROX 9/1000-00

Sample Taken By: Date Time Company

<i>T.C. Brubaker</i>	12/2/94	10:30 AM	AMERICAN STEEL FOUNDRIES
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Sample Submitted By:

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Sample Couried By:

Al Casanova	12/2/94	4:20 PM	BFI
-------------	---------	---------	-----

Sample Received By:

John Verbyka	12-2-94	4:30 PM	DeYor Laboratories
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WASTE APPROVAL FORM

Date : 12/22/94
BFI Location : Willowcreek Landfill
BFI Initiator : Casanta, Al
Generator : American Steel Foundries
Generator Location : Alliance, OH
WCD Number : AB51183
BFI Number : 202145

WASTE DESCRIPTION: Sand, Foundry
Sand, Core Butts

SAFETY PRECAUTIONS: Avoid Skin and Eye Contact.

RECOMMENDED MANAGEMENT: Direct Burial

Facility... Glenwillow Landfill
Northern Ohio Landfill
Willowcreek Landfill
Ottawa Landfill
Mahoning Landfill

COMMENTS:

WCD updated December 2, 1994.

This waste has the potential to cause dusting problems.

The following items were received by the Corporate Waste Approval Group:

- Analytical data from DeYor MetPath Laboratories
- Chain of Custody

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above.

This waste stream has been assigned BFI Waste Code: OH/217;218;219;220;855/960212/202145

Corporate Waste Approval Group

Diana L. Lasco

Technical Representative

WASTE APPROVAL REQUEST

3FI to complete this area.

BFI Initiator: A1 Casanta
Location: Willowcreek / Mason
Company Number: 218 / 611
Telephone: (216) 947-2548
Fax: (216) 947-2724
Date: Dec 2, 1994

Action Requested: ☐ New Waste Approval
☒ Up-Date Approval - Previous Number: 202145
Disposal Site Requested: 217, 218, 219, 220, R30
Company Number: " " " " "
Management Method Requested: ☒ Landfill ☒ Hauling
☐ Other _____

WASTE CHARACTERIZATION DATA
SPECIAL WASTE

IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED.

1. GENERATOR INFORMATION

a) Generator's Name: AMERICAN STEEL FOUNDRIES
b) Generating Facility's Address: 1001 E. BROADWAY ST.
City: ALLIANCE State: OH Zip: 44601
c) Generator's Representative: TERRY C. BROADWAY
Title: ENVIRONMENTAL MANAGER
Telephone: (216) 823-6150 Ext 206
Fax: (216) 821-9848
d) Emergency/Information Contact: SAME AS ABOVE
Title: _____
Telephone: () _____

e) State/Provincial/Local Registration No.: N/A
Generator's EPA Id. No.: DHD981090418
Industry Description/SIC Code: 3325
f) Customer's Name: _____
g) Customer's Mailing Address: _____
City: _____ State: _____ Zip: _____
h) Representative: _____
Telephone: () _____
Fax: () _____

2. GENERAL WASTE STREAM INFORMATION

a) Name/Description of The Waste: BROKEN CORE BOTS (EXEMPT WASTE)
b) Process Generating Waste: CORE MANUFACTURING FOR STEEL FOUNDRY
c) Is this a treatment residue of a waste which was previously a restricted hazardous waste? ☐ Yes ☒ No
If yes, describe the waste and the process generating the waste prior to treatment. _____
d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Regulations? ☐ Yes ☒ No
If yes, enter the Waste Identification Number if one has been assigned: _____
e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State, Provincial, or local Regulations?
☒ Yes ☐ No If yes, enter Waste Identification Number: N/A
f) Recommended personal protection equipment and special handling procedures: NONE
g) Anticipated Volume: 25 TONS ☐ Cubic Yards ☒ Tons ☐ Gallons ☐ Cubic Meters ☐ Tonnes(metric)
Other _____ Per: ☐ Year ☐ Month ☒ Week ☐ Day ☐ One Time ☐ Other _____
To be transported in: ☒ Bulk ☐ Drums (type/size) _____ ☐ Other _____
h) Is a representative sample included? ☒ Yes ☐ No

3. WASTE PROPERTIES AT 72°F

a) Physical State:
☒ Solid ☐ Semi-solid
☐ Powder ☐ Liquid
☐ Combination
b) Layers:
☒ Single-layered ☐ Bi-layered ☐ Multi-layered
c) Colors(s):
Describe BLACK, WHITE, GRAY & TAN
d) Odor:
Describe _____
☒ None ☐ Mild ☐ Strong

e) Density Range: N/D to _____
☐ N/D ☐ lbs/gal. ☐ g/cc.
☐ lbs./yd.³ ☐ Kg/m³ ☐ Other _____
f) Flash Point, °F:
☐ ≤ 72 ☐ 73-100 ☐ 101-140
☐ 141-200 ☐ ≥ 201 ☒ N/A ☒ N/D
g) pH:
☐ ≤ 2 ☐ 2.1 - 5.0 ☐ 5.1 - 9.0
☐ 9.1 - 12.4 ☐ ≥ 12.5 ☐ N/A ☒ N/D

4. REACTIVITY	5. THIS WASTE CONTAINS	6. SPECIAL WASTE COMPOSITION																		
<p>If the waste exhibits any of the following reactive properties:</p> <p> <input type="checkbox"/> Water Reactive <input type="checkbox"/> Acid Reactive <input type="checkbox"/> Alkaline Reactive <input type="checkbox"/> Oxidizer <input type="checkbox"/> Autopolymerizable <input type="checkbox"/> Pyrophoric <input type="checkbox"/> Explosive <input type="checkbox"/> Thermally Sensitive <input type="checkbox"/> Shock Sensitive <input checked="" type="checkbox"/> None of the above </p>	<p>Note if the waste contains any of the following: If any are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6.</p> <table style="width: 100%;"> <tr> <td style="vertical-align: top;"> <input type="checkbox"/> Free Liquids <input type="checkbox"/> Free Cyanide <input type="checkbox"/> Free Sulfide <input type="checkbox"/> Free Ammonia <input type="checkbox"/> Dioxins <input type="checkbox"/> Organic Solvents <input type="checkbox"/> Virgin Oils <input type="checkbox"/> Used Oils </td> <td style="vertical-align: top;"> <input type="checkbox"/> OSHA Substances <input type="checkbox"/> Etiological Agents <input type="checkbox"/> Pathogens <input type="checkbox"/> Biological Materials <input type="checkbox"/> Radioactive Materials <input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761 <input checked="" type="checkbox"/> None of the Above </td> </tr> </table>	<input type="checkbox"/> Free Liquids <input type="checkbox"/> Free Cyanide <input type="checkbox"/> Free Sulfide <input type="checkbox"/> Free Ammonia <input type="checkbox"/> Dioxins <input type="checkbox"/> Organic Solvents <input type="checkbox"/> Virgin Oils <input type="checkbox"/> Used Oils	<input type="checkbox"/> OSHA Substances <input type="checkbox"/> Etiological Agents <input type="checkbox"/> Pathogens <input type="checkbox"/> Biological Materials <input type="checkbox"/> Radioactive Materials <input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761 <input checked="" type="checkbox"/> None of the Above	<p>Concentration ranges are suggested and units must be identified in percentages (%) and/or parts per million (ppm). Attach additional pages if necessary.</p> <table style="width: 100%;"> <thead> <tr> <th style="text-align: left;">Components</th> <th style="text-align: left;">Range Min. / Max.</th> </tr> </thead> <tbody> <tr> <td>SAND</td> <td>95 %</td> </tr> <tr> <td>BINDERS</td> <td>5 %</td> </tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Components	Range Min. / Max.	SAND	95 %	BINDERS	5 %										
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Components	Range Min. / Max.																			
SAND	95 %																			
BINDERS	5 %																			

7. TRANSPORTATION INFORMATION

If the waste is a DOT Hazardous Material, complete the following:

Proper USDOT Shipping Name: NONE

USDOT Hazard Class: _____ UN or NA Number: _____ CERCLA Reportable Quantity: _____

8. SUPPLEMENTAL INFORMATION

☐ None
 ☒ MSD Sheets
 ☐ Analytical Data
 ☐ Chain of Custody
 ☐ Memo/Letter
 ☐ Waste Composition
☐ Other - describe: _____ No. of Pages: _____

9. GENERATOR'S CERTIFICATION

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omissions of composition or properties exist, that all known or suspected hazards have been disclosed, and that the waste is not a regulated hazardous waste by the USEPA, by an applicable State or Provincial authority, or by any applicable local authority, and does not contain PCBs regulated by TSCA (i.e., 40 CFR 761) or any Provincial authority.

GENERATOR'S AUTHORIZED SIGNATORY as identified in Section 1 (c):

12-2-94 T.C. BANDWAY T.C. Bandway Environmental Manager
 DATE PRINT NAME SIGNATURE TITLE

REPRESENTATIVE SAMPLE CERTIFICATION

This Section is to be completed by the person obtaining the sample of the above described waste.

I certify that the sample for which analytical data was provided on the waste described above is representative of that waste and was collected and preserved in a manner consistent with accepted technical standards.

Lab sample assigned to: _____ (peel off label)

Collector's Name: T.C. BANDWAY

Signature: T.C. Bandway

Company: AMERICAN STEEL FABRICATORS

Title: ENVIRONMENTAL MANAGER

Telephone Number: (216) 823-6150 EXT 206

Date Collected: 12/2/94

WCD#AB51183; BROKEN CORE BUTTS

94865450

LAB ID NO.

94 865450

DATE SAMPLED
12/02/94TIME
00:00RECEIVED
12/02/94
REPORTED
12/19/94

AMERICAN STEEL FOUNDRIES

5450

00000

	RESULT	REFERENCE LIMIT	UNITS
TCLP EXTRACTION PROC	FINAL PH=5.22		
ZERO HEADSPACE EXTRT	COMPLETED 12/07/94		
TCLP METALS & BIAS %			
ARSENIC	<0.5	0.0	5.0
Spike recovery	118		MG/L
BARIUM	<0.5	0.0	100.0
Spike recovery	99		MG/L
CADMIUM	<0.05	0.0	1.0
Spike recovery	110		MG/L
CHROMIUM	0.1	0.0	5.0
Spike recovery	92		MG/L
SELENIUM	<0.25	0.0	1.0
Spike recovery	99		MG/L
MERCURY	<0.002	0.0	0.2
Spike recovery	104		MG/L
LEAD	<0.2	0.0	5.0
Spike recovery	104		MG/L
SILVER	<0.2	0.0	5.0
Spike recovery	94		MG/L
TCLP SUPPL. METALS			
NICKEL	<0.2		MG/L
Spike recovery	100		%
COPPER	<0.05		MG/L
Spike recovery	95		%
TCLP VOA'S & BIAS %			
METHOD NUMBER	8240		
VINYL CHLORIDE	<0.002	0.0	0.2
Spike recovery	99		MG/L
1,1-DICHLOROETHYLENE	<0.002	0.0	0.7
Spike recovery	92		MG/L
METHYL ETHYL KETONE	<1.0	0.0	200
Spike recovery	104		MG/L
CHLOROFORM	<0.002	0.0	6.0
Spike recovery	102		MG/L
CARBON TETRACHLORIDE	<0.002	0.0	0.5
Spike recovery	96		MG/L
BENZENE	<0.002	0.0	0.5
Spike recovery	88		MG/L

--- DIRECTORS ---

Patrick K. Jaynes Ph.D.

Anthony Nasrallah Ph.D.



7655 Market Street, Suite 2500
 Youngstown, Ohio 44512
 (216) 758-5788
 (800) 365-3396

BFI WASTE SYSTEMS
 WILLOWCREEK LANDFILL DISTRICT
 1043 STATE ROUTE 225
 ATWATER OH 44201

Reference limit is provided for convenience. It may not apply to every hazard assessment. Be certain correct limit is applied to evaluation.

WCD#AB51183; BROKEN CORE BUTTS

94865450

94 865450

DATE SAMPLED

TIME

12/02/94

00:00

RECEIVED

12/02/94

REPORTED

12/19/94

AMERICAN STEEL FOUNDRIES

5450

00000

	RESULT	REFERENCE LIMIT		UNITS
1,2-DICHLOROETHANE	<0.002	0.0	0.5	MG/L
Spike recovery	96			%
TRICHLOROETHYLENE	<0.002	0.0	0.5	MG/L
Spike recovery	89			%
TETRACHLOROETHYLENE	<0.002	0.0	0.7	MG/L
Spike recovery	95			%
CHLOROBENZENE	<0.002	0.0	100.0	MG/L
Spike recovery	91			%
1,4-DICHLOROBENZENE	<0.002	0.0	7.5	MG/L
Spike recovery	103			%
TCLP BNA'S & BIAS %				
METHOD NUMBER	8270			
CRESOLS	<0.10	0.0	200	MG/L
Spike recovery	25			%
2,4-DINITROTOLUENE	<0.10	0.0	0.13	MG/L
Spike recovery	103			%
HEXACHLOROBENZENE	<0.10	0.0	0.13	MG/L
Spike recovery	110			%
HEXACHLOROBUTADIENE	<0.10	0.0	0.50	MG/L
Spike recovery	71			%
HEXACHLOROETHANE	<0.10	0.0	3.0	MG/L
Spike recovery	74			%
NITROBENZENE	<0.10	0.0	2.0	MG/L
Spike recovery	95			%
PENTACHLOROPHENOL	<0.10	0.0	100.	MG/L
Spike recovery	97			%
PYRIDINE	<0.10	0.0	5.0	MG/L
Spike recovery	72			%
2,4,5-TRICHLOROPHEN	<0.10	0.0	400.	MG/L
Spike recovery	54			%
2,4,6-TRICHLOROPHEN	<0.10	0.0	2.0	MG/L
Spike recovery	50			%
REACTIVITY SCREEN	SAMPLE RE-PREPARED, SURROGATES OUT ON BOTH ANALYSES.			
	SAMPLE DISPLAYED REACTIVE SULFIDE AT 2ppm			
	REACTIVE CYANIDE <2.0 PPM			
	ASTM D5049 METHOD D/D4978 METHOD B			
CORROSIVITY SCREEN	SAMPLE IS NONCORROSIVE, PH = 9.82			

--- DIRECTORS ---

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Anthony Nasrallah Ph.D.



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 WILLOWCREEK LANDFILL DISTRICT
 1043 STATE ROUTE 225
 ATWATER OH 44201

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WCD#AB51183; BROKEN CORE BUTTS

94865450


94 865450

DATE SAMPLED
12/02/94TIME
00:00RECEIVED
12/02/94
REPORTED
12/19/94

AMERICAN STEEL FOUNDRIES

5450

00000

	RESULT	REFERENCE LIMIT	UNITS
IGNITABILITY TEST	ASTM D4980 METHOD B/USEPA 9040 SAMPLE HEATED TO 160F WITHOUT FLASH OR IGNITION. ASTM D4982 METHOD B/ASTM D93		
TCLP REVIEW	TCLP PREPARATION FOLLOWS METHOD 1311 SW-846 AS REVISED NOVEMBER 24, 1992 (57FR55114) REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR 		

--- DIRECTORS ---

Patrick K. Jaynes Ph.D.

Anthony Nasrallah Ph.D.

7655 Market Street, Suite 2500
Youngstown, Ohio 44512
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(800) 365-3396BFI WASTE SYSTEMS
WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 44201Reference limit is provided for convenience. It may not
apply to every hazard assessment. Be certain correct
limit is applied to evaluation.

7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY
BROWNING-FERRIS INDUSTRIESLocation: Willowcreek Client# 623Billing Control # (Lab use only) 275550Purchase Order# 2198385Generator/Project# American Steel FoundriesLAB ID# 865450 WCD # A13 51183Waste Description: Broken Corobutts (Exempt Foundry Sand)Number of containers 2Matrix Soil ☒ Solid ☐ Multiphase ☐ Organic/oil**ANALYSES REQUESTED**RUSH ☐ Y ☐ N

- 553 ☒ TCLP Extraction
546 ☒ Zero Headspace Extraction
548 ☒ Metals + spike recoveries
544 ☒ Supplemental metals + spikes (Copper & Nickel)
585 ☐ UST Priority Panel (Metals + TPH + Rush Service)
578 ☒ Volatiles + spike recoveries
582 ☒ Semi-volatiles + spike recoveries
581 ☒ Pesticides/Herbicides + spike recoveries NO PEST-HERB
1002 ☒ Reactivity Screen
1003 ☒ Corrosivity Screen
859 ☒ Ignitability
511 ☐ Total Petroleum Hydrocarbons (TPH)
569 ☐ BETX
502 ☐ PCB (soil)
☐ Other
245 ☒ Signatory Review

APR 8 1000.00

Sample Taken By: Date Time Company

<u>T.C. Br...</u>	<u>12/2/94</u>	<u>10:30 AM</u>	<u>AMERICAN STEEL FOUNDRIES</u>
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Sample Submitted By:

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Sample Couriered By:

<u>A/Cas...</u>	<u>12/2/94</u>	<u>4:20 PM</u>	<u>BFT</u>
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Sample Received By:

<u>[Signature]</u>	<u>2-2-94</u>	<u>4:30 PM</u>	<u>DeYor Laboratories</u>
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7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY
BROWNING-FERRIS INDUSTRIESLocation: Willowcreek Client# _____

Billing Control #(Lab use only) _____

Purchase Order# 2198385Generator/Project# American Steel FoundriesLAB ID# _____ WCD # A13 51183Waste Description: Broken Core butts (Exempt Foundry Sand)Number of containers 2Matrix Soil ☒ Solid ☐ Multiphase ☐ Organic/oil**ANALYSES REQUESTED**RUSH ☐ Y ☐ N

- 553 ☒ TCLP Extraction
546 ☒ Zero Headspace Extraction
548 ☒ Metals + spike recoveries
544 ☒ Supplemental metals + spikes (Copper & Nickel)
585 ☐ UST Priority Panel (Metals + TPH + Rush Service)
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582 ☒ Semi-volatiles + spike recoveries
581 ☒ Pesticides/Herbicides + spike recoveries
1002 ☒ Reactivity Screen
1003 ☒ Corrosivity Screen
859 ☒ Ignitability
511 ☐ Total Petroleum Hydrocarbons (TPH)
569 ☐ BETX
502 ☐ PCB (soil)
☐ Other _____
245 ☒ Signatory Review

APP # 1000-00

Sample Taken By:

Date

Time

Company

<u>T.C. Br...</u>	<u>12/2/94</u>	<u>10:30 AM</u>	<u>AMERICAN STEEL FOUNDRIES</u>
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Sample Submitted By:

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Sample Couriers By:

<u>A/Cas...</u>	<u>12/2/94</u>	<u>4:20 PM</u>	<u>BFT</u>
-----------------	----------------	----------------	------------

Sample Received By:

<u>[Signature]</u>	<u>2-2-94</u>	<u>4:30 PM</u>	<u>DeYor Laboratories</u>
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WASTE APPROVAL FORM

Date : 02/16/95
BFI Location : Willowcreek Landfill
BFI Initiator : Casanta, Al
Generator : American Steel Foundries
Generator Location : Alliance, OH
WCD Number : AB61409
BFI Number : 203178

WASTE DESCRIPTION: Sludge, Dewatered

SAFETY PRECAUTIONS: Avoid Skin and Eye Contact.

RECOMMENDED MANAGEMENT: Direct Burial

Facility... Glenwillow Landfill
Northern Ohio Landfill
Willowcreek Landfill
Ottawa Landfill
Mahoning Landfill

COMMENTS:

WCD updated January 30, 1995.

All wastes containing free liquids must be solidified before disposal. Liquid waste is defined as any waste material determined to contain free liquids as defined by Method 9095 "Paint Filter Liquids Test".

The following items were received by the Corporate Waste Approval Group:

- a. Analytical data from DeYor MetPath Laboratories
- b. Chain of Custody

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above.

This waste stream has been assigned BFI Waste Code: OH/217;218;219;220;855/960326/203178

Corporate Waste Approval Group

Diana L. Lasco

Technical Representative

04 217, 218, 219, 1 900326-203178
BFI WASTE CODE 200,855

WASTE APPROVAL REQUEST

BFI to complete this area.

BFI Initiator: Al Casanta
Location: Willowcreek / Massillon
Company Number: 219 / 611
Telephone: (216) 947-2548
Fax: (216) 947-2724
Date: 1-30-95

Action Requested: ☒ New Waste Approval
☐ Up-Date Approval - Previous Number: 203178
Disposal Site Requested: 217, 218, 219, 220, 855
Company Number: " " " "
Management Method Requested: ☒ Landfill ☒ Hauling
☐ Other

WASTE CHARACTERIZATION DATA SPECIAL WASTE

IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED.

1. GENERATOR INFORMATION

a) Generator's Name: AMERICAN STEEL FOUNDRIES
b) Generating Facility's Address: 1001 E. BRADWAY
City: ALLIANCE State: OH Zip: 44601
c) Generator's Representative: T.C. BRADWAY
Title: ENVIRONMENTAL MANAGER
Telephone: (216) 823-6150 EXT 206
Fax: (216) 821-4568
d) Emergency/Information Contact: SAME AS ABOVE
Title: _____
Telephone: () _____

e) State/Provincial/Local Registration No.: _____
Generator's EPA Id. No.: 04D981090418
Industry Description/SIC Code: 3325
f) Customer's Name: Same
g) Customer's Mailing Address: _____
City: _____ State: _____ Zip: _____
h) Representative: _____
Telephone: () _____
Fax: () _____

2. GENERAL WASTE STREAM INFORMATION

a) Name/Description of The Waste: DEWATERED CLARIFIER SLUDGE WITH SAND, CLAY AND BENTONITE
b) Process Generating Waste: SAND WASHER SYSTEM CLARIFIER FOR STEEL CASTING MOLDING
c) Is this a treatment residue of a waste which was previously a restricted hazardous waste? ☐ Yes ☒ No
If yes, describe the waste and the process generating the waste prior to treatment. _____
d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Regulations? ☐ Yes ☒ No
If yes, enter the Waste Identification Number if one has been assigned: _____
e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State, Provincial, or local Regulations?
☐ Yes ☒ No If yes, enter Waste Identification Number: _____
f) Recommended personal protection equipment and special handling procedures: NONE
g) Anticipated Volume: 400 ☐ Cubic Yards ☒ Tons ☐ Gallons ☐ Cubic Meters ☐ Tonnes(metric)
Other _____ Per: ☐ Year ☐ Month ☒ Week ☐ Day ☐ One Time ☐ Other _____
To be transported in: ☒ Bulk ☐ Drums (type/size) _____ ☐ Other _____
h) Is a representative sample included? ☒ Yes ☐ No

3. WASTE PROPERTIES AT 72°F

a) Physical State:
☒ Solid ☐ Semi-solid
☐ Powder ☐ Liquid
☐ Combination
b) Layers:
☒ Single-layered ☐ Bi-layered ☐ Multi-layered
c) Color(s):
Describe BLACK
d) Odor:
Describe _____
☒ None ☐ Mild ☐ Strong

e) Density Range: _____ to _____
☒ N/D ☐ lbs/gal. ☐ g/cc.
☐ lbs./yd.³ ☐ Kg/m³ ☐ Other
f) Flash Point, °F:
☐ ≤ 72 ☐ 73-100 ☐ 101-140
☐ 141-200 ☐ ≥ 201 ☒ N/A ☐ N/D
g) pH:
☐ ≤ 2 ☐ 2.1 - 5.0 ☐ 5.1 - 9.0
☐ 9.1 - 12.4 ☐ ≥ 12.5 ☐ N/A ☒ N/D

BFI WASTE CODE

4. REACTIVITY	5. THIS WASTE CONTAINS	6. SPECIAL WASTE COMPOSITION																																
<p>Note if the waste exhibits any of the following reactive properties:</p> <p> <input type="checkbox"/> Water Reactive <input type="checkbox"/> Acid Reactive <input type="checkbox"/> Alkaline Reactive <input type="checkbox"/> Oxidizer <input type="checkbox"/> Autopolymerizable <input type="checkbox"/> Pyrophoric <input type="checkbox"/> Explosive <input type="checkbox"/> Thermally Sensitive <input type="checkbox"/> Shock Sensitive <input checked="" type="checkbox"/> None of the above </p>	<p>Note if the waste contains any of the following: If any are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6.</p> <table border="0"> <tr> <td><input type="checkbox"/> Free Liquids</td> <td><input type="checkbox"/> OSHA Substances</td> </tr> <tr> <td><input type="checkbox"/> Free Cyanide</td> <td><input type="checkbox"/> Etiological Agents</td> </tr> <tr> <td><input type="checkbox"/> Free Sulfide</td> <td><input type="checkbox"/> Pathogens</td> </tr> <tr> <td><input type="checkbox"/> Free Ammonia</td> <td><input type="checkbox"/> Biological Materials</td> </tr> <tr> <td><input type="checkbox"/> Dioxins</td> <td><input type="checkbox"/> Radioactive Materials</td> </tr> <tr> <td><input type="checkbox"/> Organic Solvents</td> <td><input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761</td> </tr> <tr> <td><input type="checkbox"/> Virgin Oils</td> <td><input checked="" type="checkbox"/> None of the Above</td> </tr> <tr> <td><input type="checkbox"/> Used Oils</td> <td></td> </tr> </table>	<input type="checkbox"/> Free Liquids	<input type="checkbox"/> OSHA Substances	<input type="checkbox"/> Free Cyanide	<input type="checkbox"/> Etiological Agents	<input type="checkbox"/> Free Sulfide	<input type="checkbox"/> Pathogens	<input type="checkbox"/> Free Ammonia	<input type="checkbox"/> Biological Materials	<input type="checkbox"/> Dioxins	<input type="checkbox"/> Radioactive Materials	<input type="checkbox"/> Organic Solvents	<input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761	<input type="checkbox"/> Virgin Oils	<input checked="" type="checkbox"/> None of the Above	<input type="checkbox"/> Used Oils		<p>Concentration ranges are suggested and units must be identified in percentages (%) and/or parts per million (ppm). Attach additional pages if necessary.</p> <table border="0"> <thead> <tr> <th>Components</th> <th>Range Min. / Max.</th> </tr> </thead> <tbody> <tr> <td>SAND</td> <td>60</td> </tr> <tr> <td>CLAY</td> <td>30</td> </tr> <tr> <td>BENTONITE</td> <td>10</td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Components	Range Min. / Max.	SAND	60	CLAY	30	BENTONITE	10								
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Components	Range Min. / Max.																																	
SAND	60																																	
CLAY	30																																	
BENTONITE	10																																	

7. TRANSPORTATION INFORMATION

If the waste is a DOT Hazardous Material, complete the following:

Proper USDOT Shipping Name: None
 USDOT Hazard Class: _____ UN or NA Number: _____ CERCLA Reportable Quantity: _____

8. SUPPLEMENTAL INFORMATION

☐ None ☒ MSD Sheets ☐ Analytical Data ☐ Chain of Custody ☐ Memo/Letter ☐ Waste Composition
☐ Other - describe: _____ No. of Pages: _____

9. GENERATOR'S CERTIFICATION

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omissions of composition or properties exist, that all known or suspected hazards have been disclosed, and that the waste is not a regulated hazardous waste by the USEPA, by an applicable State or Provincial authority, or by any applicable local authority, and does not contain PCBs regulated by TSCA (i.e., 40 CFR 761) or any Provincial authority.

GENERATOR'S AUTHORIZED SIGNATORY as identified in Section 1 (c):

9-30-95 J.C. Bradway J.C. Bradway Environmental Manager
 DATE PRINT NAME SIGNATURE TITLE

REPRESENTATIVE SAMPLE CERTIFICATION

This Section is to be completed by the person obtaining the sample of the above described waste.

I certify that the sample for which analytical data was provided on the waste described above is representative of that waste and was collected and preserved in a manner consistent with accepted technical standards.

Lab sample assigned to: _____ (peel off label)

Collector's Name: J.C. Bradway

Signature: J.C. Bradway

Company: American Steel Foundries

Title: Environmental Manager

Telephone Number: (216) 823-6150 Ext. 206

Date Collected: 1/30/95

CLIENT SAMPLE IDENTIFICATION

AB61409 DEWATERED CLARIFIER SL

95875499

LAB ID NO.

95 875499

DATE SAMPLED

01/30/95

TIME

09:30

RECEIVED

01/31/95

REPORTED

02/13/95

AMERICAN STEEL FOUNDRIES

5499

00000

	RESULT	REFERENCE LIMIT	UNITS
TCLP EXTRACTION PROC	FINAL PH=5.09		
TCLP METALS & BIAS %			
ARSENIC	<0.5	0.0 5.0	MG/L
Spike recovery	116		%
BARIUM	<0.5	0.0 100.0	MG/L
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Spike recovery	112		%
MERCURY	<0.002	0.0 0.2	MG/L
Spike recovery	112		%
LEAD	<0.2	0.0 5.0	MG/L
Spike recovery	100		%
SILVER	<0.2	0.0 5.0	MG/L
Spike recovery	98		%
TCLP SUPPL. METALS			
NICKEL	<0.2		MG/L
Spike recovery	90		%
COPPER	<0.05		MG/L
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TCLP VOA'S & BIAS %			
METHOD NUMBER	8240		
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Spike recovery	96		%
METHYL ETHYL KETONE	<1.0	0.0 200	MG/L
Spike recovery	105		%
CHLOROFORM	<0.002	0.0 6.0	MG/L
Spike recovery	94		%
CARBON TETRACHLORIDE	<0.002	0.0 0.5	MG/L
Spike recovery	100		%
BENZENE	<0.002	0.0 0.5	MG/L
Spike recovery	98		%
1,2-DICHLOROETHANE	<0.002	0.0 0.5	MG/L

--- DIRECTORS ---

Patrick K. Jaynes Ph.D.

/ Tony Nasrallah Ph.D.



7655 Market Street, Suite 2500

Youngstown, Ohio 44512

(216) 758-5788

(800) 365-3396

BFI WASTE SYSTEMS
 WILLOWCREEK LANDFILL DISTRICT
 1043 STATE ROUTE 225
 ATWATER OH 44201

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 apply to every hazard assessment. Be certain correct
 limits are applied to the situation.

Reference limit is provided for convenience. It may not apply to every hazard assessment. Be certain correct limit is applied to evaluation.



(800) 365-3396
(216) 758-5788

DeYor Laboratories Inc.
Southwoods Medical-Health Complex

7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY
BROWNING-FERRIS INDUSTRIES

Location: Willow Creek Client# 623

Billing Control # (Lab use only) 95276322

Purchase Order# 2192090

Generator/Project# American Steel Foundries

LAB ID# 875499 WCD # AB61409

Waste Description: Dewatered Clarifier Sludge

Number of containers 2

Matrix Soil ☒ Solid ☐ Multiphase ☐ Organic/oil

ANALYSES REQUESTED

RUSH

Y

N

- 553 ☒ TCLP Extraction
546 ☒ Zero Headspace Extraction
548 ☒ Metals + spike recoveries
544 ☒ Supplemental metals + spikes (Copper & Nickel)
585 ☐ UST Priority Panel (Metals + TPH + Rush Service)
578 ☒ Volatiles + spike recoveries
582 ☒ Semi-volatiles + spike recoveries
581 ☐ Pesticides/Herbicides + spike recoveries
1002 ☐ Reactivity Screen
1003 ☐ Corrosivity Screen
859 ☐ Ignitability
511 ☐ Total Petroleum Hydrocarbons (TPH)
569 ☐ BETX
502 ☐ PCB (soil)
Other ☐
245 ☒ Signatory Review

\$ 900.00 - \$ 1,000.00
Bill Generator

Sample Taken By:	Date	Time	Company
<u>Terry Broadway</u>	<u>1-30-95</u>	<u>9:30 AM</u>	<u>A.S.F.</u>
Sample Submitted By:			
Sample Couriered By:			
<u>Bob M.H.</u>	<u>1/31/95</u>	<u>1130 AM</u>	<u>DeYor</u>
Sample Received By:			
<u>Dennis Brady</u>	<u>1-31-95</u>	<u>1300</u>	<u>DeYor Laboratories</u>



(800) 365-3396
(216) 758-5788

DeYor Laboratories Inc.
Southwoods Medical-Health Complex

7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY
BROWNING-FERRIS INDUSTRIES

Location: Willow creek K Client# _____

Billing Control #(Lab use only) _____

Purchase Order# 2192090

Generator/Project# American Steel Foundries

LAB ID# _____ WCD # AB61409

Waste Description: Dewatered Clarifier Sludge
Number of containers 2

Matrix ☐ Soil ☒ Solid ☐ Multiphase ☐ Organic/oil

ANALYSES REQUESTED

RUSH Y ☒ N

- 553 ☒ TCLP Extraction
546 _____ Zero Headspace Extraction
548 ☒ Metals + spike recoveries
544 ☒ Supplemental metals + spikes (Copper & Nickel)
585 _____ UST Priority Panel (Metals + TPH + Rush Service)
578 ☒ Volatiles + spike recoveries
582 ☒ Semi-volatiles + spike recoveries
581 _____ Pesticides/Herbicides + spike recoveries
1002 _____ Reactivity Screen
1003 _____ Corrosivity Screen
859 _____ Ignitability
511 _____ Total Petroleum Hydrocarbons (TPH)
569 _____ BETX
502 _____ PCB (soil)
_____ Other
245 ☒ Signatory Review

\$ 900.00 - \$1,000.00
Bill Generator

Sample Taken By:	Date	Time	Company
<u>Terry Bradway</u>	<u>1-30-95</u>	<u>9:30 AM</u>	<u>A.S.F.</u>
Sample Submitted By:			
Sample Couried By:			
<u>Rob M.L.</u>	<u>1/31/95</u>	<u>1130 AM</u>	<u>DeYor</u>
Sample Received By:			
			DeYor Laboratories



WASTE APPROVAL FORM

Date : 02/15/95
BFI Location : Willowcreek Landfill
BFI Initiator : Casanta, Al
Generator : American Steel Foundries
Generator Location : Alliance, OH
WCD Number : AB61410
BFI Number : 203177

WASTE DESCRIPTION: Lamps, Fluorescent

SAFETY PRECAUTIONS: Avoid Skin and Eye Contact.

RECOMMENDED MANAGEMENT: Direct Burial

Facility... Glenwillow Landfill
Northern Ohio Landfill
Willowcreek Landfill
Mahoning Landfill

COMMENTS:

WCD updated January 31, 1995.

This waste has the potential to cause dusting problems.

The following items were received by the Corporate Waste Approval Group:

- a. Analytical data from DeYor MetPath Laboratories
- b. Chain of Custody

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above.

This waste stream has been assigned BFI Waste Code: OH/217:218:219:855/960323/203177

Corporate Waste Approval Group

Diana L. Lasco
Technical Representative



BROWNING-FERRIS INDUSTRIES

WCD No. AB

61410

OH 217, 218, 219, 1 960 323 203177
BFI WASTE CODE 855

WASTE APPROVAL REQUEST

BFI to complete this area.

BFI Initiator: AI Casanta
Location: Willow Creek / Mason
Company Number: 215 611
Telephone: 216 947-2548
Fax: 216 947-2729
Date: 1-30-96

Action Requested: ☐ New Waste Approval
☒ Up-Date Approval - Previous Number: 203177
Disposal Site Requested: 217 218 219 226 856
Company Number: _____
Management Method Requested: ☒ Landfill ☒ Hauling
☐ Other _____

WASTE CHARACTERIZATION DATA SPECIAL WASTE

IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED.

1. GENERATOR INFORMATION

a) Generator's Name: AMERICAN STEEL FOUNDRIES
b) Generating Facility's Address: 1001 E. BRADWAY
City: ALLIANCE State: OH Zip: 44601
c) Generator's Representative: T.C. BRADWAY
Title: ENVIRONMENT MANAGER
Telephone: (216) 823-6150 EXT. 206
Fax: (216) 821-4568
d) Emergency/Information Contact: SAME AS ABOVE
Title: _____
Telephone: () _____

e) State/Provincial/Local Registration No.: _____
Generator's EPA Id. No.: OH D981090418
Industry Description/SIC Code: 3325
f) Customer's Name: Same
g) Customer's Mailing Address: _____
City: _____ State: _____ Zip: _____
h) Representative: _____
Telephone: () _____
Fax: () _____

2. GENERAL WASTE STREAM INFORMATION

a) Name/Description of The Waste: BROKEN FLUORESCENT LIGHT BULBS
b) Process Generating Waste: ELECTRICAL DEPARTMENT (MAINTENANCE)
c) Is this a treatment residue of a waste which was previously a restricted hazardous waste? ☐ Yes ☒ No
If yes, describe the waste and the process generating the waste prior to treatment. _____
d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Regulations? ☐ Yes ☒ No
If yes, enter the Waste Identification Number if one has been assigned: _____
e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State, Provincial, or local Regulations?
☒ Yes ☐ No If yes, enter Waste Identification Number: NA
f) Recommended personal protection equipment and special handling procedures: NONE
g) Anticipated Volume: 1 CY ☒ Cubic Yards ☐ Tons ☐ Gallons ☐ Cubic Meters ☐ Tonnes(metric)
Other _____ Per: ☒ Year ☐ Month ☐ Week ☐ Day ☐ One Time ☐ Other _____
To be transported in: ☒ Bulk ☐ Drums (type/size) _____ ☐ Other _____
h) Is a representative sample included? ☒ Yes ☐ No

3. WASTE PROPERTIES AT 72°F

a) Physical State:
☒ Solid ☐ Semi-solid
☐ Powder ☐ Liquid
☐ Combination
b) Layers:
☒ Single-layered ☐ Bi-layered ☐ Multi-layered
c) Color(s):
Describe WHITE
d) Odor:
Describe _____
☒ None ☐ Mild ☐ Strong

e) Density Range: _____ to _____
☒ N/D ☐ lbs/gal. ☐ g/cc.
☐ lbs./yd.³ ☐ Kg/m³ ☐ Other _____
f) Flash Point, °F:
☐ ≤ 72 ☐ 73-100 ☐ 101-140
☐ 141-200 ☐ ≥ 201 ☒ N/A ☒ N/D
g) pH:
☐ ≤ 2 ☐ 2.1 - 5.0 ☐ 5.1 - 9.0
☐ 9.1 - 12.4 ☐ ≥ 12.5 ☐ N/A ☒ N/D

BFI WASTE CODE

4. REACTIVITY	5. THIS WASTE CONTAINS	6. SPECIAL WASTE COMPOSITION																																
<p>Note if the waste exhibits any of the following reactive properties:</p> <p> <input type="checkbox"/> Water Reactive <input type="checkbox"/> Acid Reactive <input type="checkbox"/> Alkaline Reactive <input type="checkbox"/> Oxidizer <input type="checkbox"/> Autopolymerizable <input type="checkbox"/> Pyrophoric <input type="checkbox"/> Explosive <input type="checkbox"/> Thermally Sensitive <input type="checkbox"/> Shock Sensitive <input checked="" type="checkbox"/> None of the above </p>	<p>Note if the waste contains any of the following: If any are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6.</p> <table style="width:100%;"> <tr> <td><input type="checkbox"/> Free Liquids</td> <td><input type="checkbox"/> OSHA Substances</td> </tr> <tr> <td><input type="checkbox"/> Free Cyanide</td> <td><input type="checkbox"/> Etiological Agents</td> </tr> <tr> <td><input type="checkbox"/> Free Sulfide</td> <td><input type="checkbox"/> Pathogens</td> </tr> <tr> <td><input type="checkbox"/> Free Ammonia</td> <td><input type="checkbox"/> Biological Materials</td> </tr> <tr> <td><input type="checkbox"/> Dioxins</td> <td><input type="checkbox"/> Radioactive Materials</td> </tr> <tr> <td><input type="checkbox"/> Organic Solvents</td> <td><input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761</td> </tr> <tr> <td><input type="checkbox"/> Virgin Oils</td> <td><input checked="" type="checkbox"/> None of the Above</td> </tr> <tr> <td><input type="checkbox"/> Used Oils</td> <td></td> </tr> </table>	<input type="checkbox"/> Free Liquids	<input type="checkbox"/> OSHA Substances	<input type="checkbox"/> Free Cyanide	<input type="checkbox"/> Etiological Agents	<input type="checkbox"/> Free Sulfide	<input type="checkbox"/> Pathogens	<input type="checkbox"/> Free Ammonia	<input type="checkbox"/> Biological Materials	<input type="checkbox"/> Dioxins	<input type="checkbox"/> Radioactive Materials	<input type="checkbox"/> Organic Solvents	<input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761	<input type="checkbox"/> Virgin Oils	<input checked="" type="checkbox"/> None of the Above	<input type="checkbox"/> Used Oils		<p>Concentration ranges are suggested and units must be identified in percentages (%) and/or parts per million (ppm). Attach additional pages if necessary.</p> <table style="width:100%;"> <thead> <tr> <th style="text-align: left;">Components</th> <th style="text-align: left;">Range Min. / Max.</th> </tr> </thead> <tbody> <tr> <td>Crushed Fluorescent Bulbs</td> <td>100 %</td> </tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Components	Range Min. / Max.	Crushed Fluorescent Bulbs	100 %												
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Components	Range Min. / Max.																																	
Crushed Fluorescent Bulbs	100 %																																	
7. TRANSPORTATION INFORMATION																																		
<p>If the waste is a DOT Hazardous Material, complete the following:</p> <p>Proper USDOT Shipping Name: <u>NONE</u></p> <p>USDOT Hazard Class: _____ UN or NA Number: _____ CERCLA Reportable Quantity: _____</p>																																		
8. SUPPLEMENTAL INFORMATION																																		
<p> <input type="checkbox"/> None <input type="checkbox"/> MSD Sheets <input checked="" type="checkbox"/> Analytical Data <input type="checkbox"/> Chain of Custody <input type="checkbox"/> Memo/Letter <input type="checkbox"/> Waste Composition </p> <p> <input type="checkbox"/> Other - describe: <u>NONE</u> No. of Pages: _____ </p>																																		
9. GENERATOR'S CERTIFICATION																																		
<p>I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omissions of composition or properties exist, that all known or suspected hazards have been disclosed, and that the waste is not a regulated hazardous waste by the USEPA, by an applicable State or Provincial authority, or by any applicable local authority, and does not contain PCBs regulated by TSCA (i.e., 40 CFR 761) or any Provincial authority.</p> <p>GENERATOR'S AUTHORIZED SIGNATORY as identified in Section 1 (c):</p> <table style="width:100%;"> <tr> <td style="width:15%;"><u>1-31-95</u></td> <td style="width:35%;"><u>T.C. BRADWAY</u></td> <td style="width:35%;"><u>T.C. Bradway</u></td> <td style="width:15%;"><u>ENVIRONMENTAL MANAGER</u></td> </tr> <tr> <td>DATE</td> <td>PRINT NAME</td> <td>SIGNATURE</td> <td>TITLE</td> </tr> </table>			<u>1-31-95</u>	<u>T.C. BRADWAY</u>	<u>T.C. Bradway</u>	<u>ENVIRONMENTAL MANAGER</u>	DATE	PRINT NAME	SIGNATURE	TITLE																								
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DATE	PRINT NAME	SIGNATURE	TITLE																															
REPRESENTATIVE SAMPLE CERTIFICATION																																		
<p>This Section is to be completed by the person obtaining the sample of the above described waste.</p> <p>I certify that the sample for which analytical data was provided on the waste described above is representative of that waste and was collected and preserved in a manner consistent with accepted technical standards.</p> <p>Lab sample assigned to: <u>EC LABS</u> (peel off label)</p> <p>Collector's Name: <u>T.C. BRADWAY</u></p> <p>Signature: <u>T.C. Bradway</u></p> <p>Company: <u>AMERICAN STEEL FOUNDRIES</u></p> <p>Title: <u>ENVIRONMENTAL MANAGER</u></p> <p>Telephone Number: <u>(216) 823-6150 Ext 206</u></p> <p>Date Collected: <u>1/31/95</u></p>																																		

CLIENT SAMPLE IDENTIFICATION

AB61410 CRUSHED FLOURESCENT LA

95875500

LAB ID NO.

95 875500

DATE SAMPLED

TIME

RECEIVED

01/30/95

09:30

01/31/95

REPORTED

AMERICAN STEEL FOUNDRIES

5500

00000

02/10/95

RESULT

REFERENCE LIMIT

UNITS

TCLP EXTRACTION PROC
TCLP METALS & BIAS %

FINAL PH=5.15

ARSENIC	<0.5	0.0	5.0	MG/L
Spike recovery	112			%
BARIUM	0.8	0.0	100.0	MG/L
Spike recovery	100			%
CADMIUM	<0.05	0.0	1.0	MG/L
Spike recovery	91			%
CHROMIUM	<0.05	0.0	5.0	MG/L
Spike recovery	96			%
SELENIUM	<0.25	0.0	1.0	MG/L
Spike recovery	112			%
MERCURY	0.175	0.0	0.2	MG/L
Spike recovery	104			%
LEAD	<0.2	0.0	5.0	MG/L
Spike recovery	96			%
SILVER	<0.2	0.0	5.0	MG/L
Spike recovery	87			%
TCLP SUPPL. METALS				
NICKEL	<0.2			MG/L
Spike recovery	90			%
COPPER	1.20			MG/L
Spike recovery	85			%
TCLP REVIEW				

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846
AS REVISED NOVEMBER 24, 1992 (57FR55114)
REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR



--- DIRECTORS ---

Patrick K. Jaynes Ph.D.
Anthony Nasrallah Ph.D.



7655 Market Street, Suite 2500
Youngstown, Ohio 44512
(216) 753-5788
(800) 365-3396

BFI WASTE SYSTEMS
WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 44201

Reference limit is provided for convenience. It may not
apply to every hazard assessment. Be certain correct
limit is applied to evaluation.

Dennis Brader 1-31-95 13:00 DeYor Laboratories

53-R4505 (REPRINT)
LTS WASHER SERVICE
FLUID RECOVERY SERVICES

PREQUALIFICATION EVALUATION

PAGE 1 OF 3
COMPLETED: 12/22/94
REVISED:
RUN: 01/25/95

ACCEPT FOR SHIPMENT

RANCH/SUBMITTER: 404003
AKRON

CONTROL #: 234928-3
LAB #: 42231-1
SAMPLE #: 344271

GENERATOR INFORMATION: CUSTOMER NUMBER: 4040-03-9881

AMERICAN STEEL FOUNDRIES
1000 E BROADWAY
ALLIANCE, OH 44601

ATTN: TERRY BRADWAY

BRANCH: 404003 - AKRON

GENERAL DESCRIPTION: KEROSENE DIESEL FUEL OIL

NATURE OF BUSINESS: FOUNDRY S.I.C.: STATUS: LQG

FACILITY ADDRESS: MANIFEST BILLING ADDRESS:

1000 E BROADWAY
ALLIANCE, OH 44601

PROCESS DESCRIPTION: DRAIN EQUIP

GENERATION AMOUNT: 55 GALLONS YEARLY

P.O. #: DATE SURVEY SIGNED: 12/06/94

CONTACT: TERRY BRADWAY TITLE: ENV COOR PHN: 216-823-6150

CORPORATE REVIEW:

DISPOSITION: ACCEPT FOR SHIP PART NUMBER: 0082101 WASTE, SPEC. FUELS-55

REVIEW DATE: 12/22/1994 REVIEWERS: MJK

APPROVED FACILITIES:

SAFETY-KLEEN CORP.
633 E 138TH ST
DOLTON, IL 60419

SAFETY-KLEEN CORP.
3700 LAGRANGE ROAD
SMITHFIELD, KY 40068
KYD053348108

FED EPA#: ILD980613913

STATE EPA#: 0310690006

TELEPHONE: 7088494850

STATE AUTH: 000161

5028452453

APPROVED DOT - SHIPPING DESCRIPTION

0001130 DRUM OR BULK

NO WASTE PETROLEUM DISTILLATES, N.O.S.
(ALIPHATIC AND AROMATIC HYDROCARBONS)
3 UN1268 PG II (D001)(ERG#27)

US EPA WASTE CODES: D001

USA

REVIEW COMMENTS:

*

* OK FOR FUEL.

THIS SERVES AS NOTICE PER 40 CFR 264.12(B) THAT EACH FACILITY NOTED ABOVE
HAS THE APPROPRIATE PERMITS, IS CAPABLE, HAS CAPACITY AND IS WILLING TO
ACCEPT THE MATERIAL AS DESCRIBED IN THE APPROVAL SECTION.

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

81363-R4505 (REPRINT)
PARTS WASHER SERVICE
FLUID RECOVERY SERVICES

PREQUALIFICATION EVALUATION

PAGE 2 OF 3
COMPLETED: 12/22/94
REVISED:
RUN: 01/25/95

ACCEPT FOR SHIPMENT

ANCH/SUBMITTER: 404003
BARON

CONTROL #: 234928-3
LAB #: 42231-1
SAMPLE #: 344271

GENERAL ANALYSIS OF TOTAL SAMPLE

COLOR : ORANGE
WATER CONTENT : 1.9 WT%
NON-VOLATILE RESIDUE : 43.9 WT% DESCRIPTION: OIL
FLAMMABILITY : FLASHED AT 73 F BY SETAFLASH
FLAMMABILITY : FLASHED AT 140 F BY SETAFLASH
PH : EXTRACT BY METER 6.5
RADIOACTIVITY : NONE DETECTED

FUEL EVALUATION OF TOTAL SAMPLE

HEAT CONTENT : 19400 BTU/LB ASH UPON COMBUSTION : 0.7 WT%
TOTAL BROMINE BR < 0.1 TOTAL CHLORINE CL: < 0.1 WT%
TOTAL FLUORINE F < 0.1 TOTAL SULFUR S : < 0.1 WT%

GENERAL COMPOSITION:

COMPOSITION BY:

APPEARANCE
(VOL%)

TOTAL
(WT%)

AQUEOUS PHASE (FREE WATER)	0.0	0.0
ORGANIC PHASE (FEEDSTOCK)	100.0	100.0
BOTTOM SLUDGE (SEMISOLIDS)	0.0	0.0
BOTTOM SOLID (SETTLED SOLIDS)	0.0	0.0

TOTAL 100.0 100.0

TOTAL PHASE SPECIFIC GRAVITY: .820 VISCOSITY (CENTIPOISE): < 50 CPS

SPECIFIC COMPOSITION OF TOTAL SAMPLE

COMPOSITION OF:

TOTAL
SAMPLE
(WT%)

TOTAL
SAMPLE
(WT%)

WATER CONTENT	1.9	1.9
NON-VOLATILE RESIDUE	43.9	43.9
VOLATILE ORGANICS BY DIFFERENCE	54.2	54.2
TOTAL	100.0	100.0

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

81363-R4505 (REPRINT)
PARTS WASHER SERVICE
FLUID RECOVERY SERVICES

PREQUALIFICATION EVALUATION

PAGE 3 OF 3
COMPLETED: 12/22/94
REVISED:
RUN: 01/25/95

ACCEPT FOR SHIPMENT

ANCH/SUBMITTER: 404003
IRON

CONTROL #: 234928-3
LAB #: 42231-1
SAMPLE #: 344271

VOLATILE ORGANIC COMPOSITION OF TOTAL SAMPLE BY GAS CHROMATOGRAPHY
SAMPLE PREPARATION METHODS: NEAT
DETECTION METHODS : FID, FID

COMPOUND NAME	COMPOSITION OF:	VOLATILE ORGANICS (WT%)	TOTAL SAMPLE (WT%)
HIGH-BOILING ALIPHATIC HYDROCARBONS (C14-C20) CODE: HHC CAS NUMBER:		56.3	30.5
MEDIUM-BOILING ALIPHATIC HYDROCARBONS (C9-C13) CODE: MHC CAS NUMBER: 8030-30-6		29.9	16.2
LOW-BOILING ALIPHATIC HYDROCARBONS (C5-C8) CODE: LHC CAS NUMBER: 64741-89-5		10.3	5.6
XYLENES (ORTHO-, META-, AND PARA-) CODE: XYLS CAS NUMBER: 1330-20-7		1.6	0.9
TOLUENE CODE: TOL CAS NUMBER: 108-88-3		1.4	0.8
TOTAL OTHERS (<1.0% EACH) CODE: TO CAS NUMBER:		0.5	0.3
TOTAL		100.0	54.2

SPECIFIC ORGANIC COMPOSITION
POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

LABORATORY REVIEW: A SEG CODE: REVIEWERS: TLM TLM LAB: PREQ NEW CASTLE
RELEASED: 12/20/94 ANALYZED: 12/20/94 SUBMITTED: 12/12/94

THE ANALYSIS CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF
QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN CORP. IN
ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS REQUIRED.

*** ACCEPT FOR SHIPMENT

END OF DOCUMENT

TO: SAFETY-KLEEN CORP.
3700 LAGRANGE ROAD
SMITHFIELD, KY 40068

EPA ID: KYD053348108

UNDER MANIFEST NUMBER _____ LINE NUMBER _____
THE GENERATOR NOTED BELOW IS SHIPPING TO YOU A RESTRICTED WASTE UNDER
FEDERAL AND STATE LAND DISPOSAL RESTRICTION REGULATIONS.
IN ACCORDANCE WITH THESE REGULATIONS, THE GENERATOR HEREBY PROVIDES
NOTICE THAT THE WASTE IS RESTRICTED AND THE EPA WASTE CODES
AND APPROPRIATE TREATMENT STANDARDS ARE AS FOLLOWS:

HAZARDOUS WASTE CODES: D001

TREATABILITY GROUP: NONWASTEWATERS

EPA WASTE CODE	WASTE DESCRIPTION AND TREATMENT/REGULATORY SUBCATEGORY	TREATMENT STANDARD CONCENTRATION OR TECHNOLOGY CODE
D001	HIGH TOC IGNITABLE CHARACTERISTIC WASTE.	RORGS; OR CMBST **
D001	HIGH TOC IGNITABLE LIQUIDS SUBCATEGORY.	FSUBS; RORGS; OR INCIN***

NOTES: * THESE TREATMENT STANDARDS DO NOT PRECLUDE SOLVENT RECOVERY OR
USE AS FUEL PRIOR TO LAND DISPOSAL.
** NEW TREATMENT STANDARDS UNDER FEDERAL RULES EFFECTIVE 12-19-94.
*** TREATMENT STANDARDS APPLICABLE IN CERTAIN HSWA-AUTHORIZED STATES.
**** AND MEET UNIVERSAL TREATMENT STANDARDS EFFECTIVE 12-19-94.

GENERATOR NAME: American Steel Foundries

EPA ID: _____

GENERATOR SIGNATURE (OPTIONAL): _____

NAME & TITLE (OPTIONAL): _____

SAFETY-KLEEN SAMPLE NUMBER: 344271

CONTROL NUMBER: 234928-3

TO: SAFETY-KLEEN CORP.
3700 LAGRANGE ROAD
SMITHFIELD, KY 40068

EPA ID: KYD053348108

UNDER MANIFEST NUMBER _____ LINE NUMBER _____
THE GENERATOR NOTED BELOW IS SHIPPING TO YOU A RESTRICTED WASTE UNDER
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AND APPROPRIATE TREATMENT STANDARDS ARE AS FOLLOWS:

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TREATABILITY GROUP: NONWASTEWATERS

EPA WASTE CODE	WASTE DESCRIPTION AND TREATMENT/REGULATORY SUBCATEGORY	TREATMENT STANDARD CONCENTRATION OR TECHNOLOGY CODE
D001	HIGH TOC IGNITABLE CHARACTERISTIC WASTE.	RORGS; OR CMBST **
D001	HIGH TOC IGNITABLE LIQUIDS SUBCATEGORY.	FSUBS; RORGS; OR INCIN***

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** NEW TREATMENT STANDARDS UNDER FEDERAL RULES EFFECTIVE 12-19-94.
*** TREATMENT STANDARDS APPLICABLE IN CERTAIN HSWA-AUTHORIZED STATES.
**** AND MEET UNIVERSAL TREATMENT STANDARDS EFFECTIVE 12-19-94.

GENERATOR NAME: American Steel Foundries

EPA ID: _____

GENERATOR SIGNATURE (OPTIONAL): _____

NAME & TITLE (OPTIONAL): _____

SAFETY-KLEEN SAMPLE NUMBER: 344271

CONTROL NUMBER: 234928-3



Safety-Kleen® MATERIAL SURVEY

SK USE ONLY

4-040-123-
SAFETY-KLEEN CUSTOMER NUMBER

LINE OF BUSINESS _____

SK Survey No.

344271

SK USE ONLY

Control No. _____

Lab No. _____

A Generator Name Amesbury Steel Fabricator
 Nature of Business Smelting S.I.C. No. _____
 ID Numbers: Federal EPA _____ State _____ ID _____ State _____ ID _____
 Status: ☐ Large Quantity Generator (LQG) ☐ Small Quantity Generator (SQG) ☐ Conditionally Exempt Small Quantity Generator (CESQG)

B Facility Street Address (No P.O. Boxes) ☐ Manifest Address Billing Name & Address (If Different) ☐ Manifest Address
1000 E. Franklin
 City William State OH Zip 44601 City _____ State _____ Zip _____

C General Description of Material Heavy Duty Fuel Oil
 Process Description From Engine
 Generation Amount 55 Gallons
 Per ☐ Week ☐ Month ☐ Quarter ☒ Year ☐ One Time Only
 Gallons On Hand 5 ☐ Drums ☐ Bulk
 Shipping Schedule 52 ☐ Drums ☐ Bulk
 Physical Description: Color: Black
 Percent Solids that Could Not be Sampled 0
 pH Range ☐ <=2.0 ☐ 2-4 ☒ 4-10 ☐ 10-12.5 ☐ >=12.5
 Layers or Phases ☒ One ☐ Two ☐ Three
 Physical State ☒ Liquid ☐ Paste ☐ Solid
 Liquid Viscosity ☒ Low ☐ Medium ☐ High

D Material Composition ☐ Vol % ☐ Wt % Max Typical
Hydrocarbons 95%
Diesel Fuel 2.5%
Oil 2%
 TOTAL (Typical should not exceed 100%) 100 %

E Attach material safety data sheets (MSDS) for material components and any current EP Toxic, TCLP, or other analysis of the material.
☐ MSDS attached ☐ EP Toxic analysis attached ☐ TCLP analysis attached ☐ Other Analysis attached ☒ No attachments

F-1 Determine if any of the following prohibited substances may be in the material. MUST BE COMPLETED!
☐ Yes ☒ No DOT Radioactives, Explosives, or materials forbidden from transport.
☐ Yes ☒ No TSCA regulated materials, Chlorinated biphenyls (PCB), Brominated biphenyls (PBB), Chlorinated dibenzodioxins or furans.
☐ Yes ☒ No Products used as pesticides, herbicides, insecticides or by-products of pesticide manufacture.
☐ Yes ☒ No Human carcinogens above exclusion levels as defined by OSHA (Ref. 29 CFR 1910.1001-).
☐ Yes ☒ No Reactive components (Sulfides, Cyanides, Shock sensitive materials, Pyrophoric compounds).
☐ Yes ☒ No Biological hazards (such as Pathogenic materials, Infectious agents, Etiologic agents, USEPA Medical Waste).

F-2 Determine if any of the following restricted substances may be in the material. MUST BE COMPLETED!
☐ Yes ☒ No Toxic metals (Arsenic, Barium, Beryllium, Cadmium, Chromium, Lead, Mercury, Nickel, Selenium, Silver, Thallium).
☐ Yes ☒ No Water or amine-reactive components (such as unreacted Isocyanate monomers and resins, Acid chlorides, Anhydrides, Epoxides).

F-3 If yes, then identify substances and concentration _____

G DOT Hazardous Material Description ☐ Reportable Quantity (Lbs): ☐ 5000 ☐ 1000 ☐ 100 ☐ 10 ☐ 1
 Proper Shipping Name _____
 Hazard Class _____ UN/NA Number _____ P.G. _____ ☐ Not DOT Hazardous Material ☒ Not sure

SK USE ONLY

☐ Accepted for Analysis

☐ Accepted Conditionally

☐ Suspended for More Information

☐ Rejected

Comments _____

Safety Evaluated By _____

Date _____

GENERATOR

H EPA Waste Description and Treatment Standards (COMPLETE ALL QUESTIONS WITHIN ONE SECTION ONLY).

SK Survey No.

344271

IS THIS MATERIAL A RCRA "HAZARDOUS WASTE"? (Ref. 40 CFR 261)

☒ CHECK ONE BOX ON LEFT

SECTION
H-1

1. For hazardous wastes, if waste is a "listed" waste, such as "spent solvent" (F001-5), then show the applicable EPA Waste Codes:

☐ F001 ☐ F002 ☐ F003 ☐ F004 ☐ F005 ☐ F006 ☐ K086 Other, specify _____

☐ Not Applicable

2. For all hazardous wastes, the generator must determine if waste exhibits a characteristic of a hazardous waste, either based on knowledge or testing. Based on this determination, show all applicable EPA Waste Codes.

☒ D001 ☐ D002 ☐ D003 ☐ D004 ☐ D005 ☐ D006 ☐ D007 ☐ D008 ☐ D009 ☐ D010 ☐ D011

☐ Not Applicable

3. Based on Land Disposal Restrictions, does waste have a technology-based treatment standard? (Ref. 40 CFR 268) ☒ Not sure ☐ Yes ☐ No

If yes, then show all applicable technology codes: ☐ DEACT ☐ RORGS ☐ FSUBS ☐ INCIN Other, specify _____

4. List all applicable State Waste Codes required by generating facility state: _____ ☐ None required ☐ Not sure

SECTION
H-2

1. Is this material exempt from waste regulations under RCRA (i.e., not a "solid waste")? (Ref. 40 CFR 261)

☐ Yes (Skip to 5) ☐ No

2. Is this waste an "used oil" (used petroleum oil) for fuel or recovery, not disposal? (Ref. 40 CFR 279)

☐ Yes (Skip to 5) ☐ No

3. Is this waste exempt from regulation as a hazardous waste? If yes, explain why in Comments.

☐ Yes (Skip to 5) ☐ No

4. For all other "non-hazardous" wastes, submit survey with Toxicity Characteristic Leaching Procedure (TCLP) analysis results. If TCLP analysis is not available, then contact a Safety-Kleen representative about obtaining this analysis.

5. List all applicable State Waste Codes required by generating facility state: _____ ☐ None required ☐ Not sure

SECTION
H-3

Show SK Codes for all regulated chemicals listed in the Reference Table on the back page which can be present in material, even in trace amounts.

☐ NOT SURE _____ ☐ None present

Are any of these chemicals used as solvents? ☐ Yes ☐ No Are these solvents used to remove oil, grease, or wax? ☐ Yes ☐ No

I Safety-Kleen Corp. requires a representative sample and charges a fee for the prequalification of all new material. P.O. No. _____
Type of sample: ☐ From Line ☐ From Tank ☒ Composite of _____ drums Sample taken by ☐ Customer ☒ Safety-Kleen Representative

J Generator Certification (Not a waste handling agreement):
On behalf of the Generator, I hereby warrant, represent, and certify that: all information submitted in this document is true, accurate, and complete; all known or suspected hazards have been disclosed; and, I am a duly authorized employee of the Generator.
Generator agrees to indemnify and hold Safety-Kleen Corp. and its subsidiaries harmless for any claims, liabilities, damages, and costs including, but not limited to, attorney's fees, arising out of or in any way related to breach of the above warranty by the Generator.
Name TERRY BRADWAY Title ENV. COOR.
Signature X J. C. Bradway Date 12-6-99 Phone (216) 823-6150
Contact TERRY BRADWAY Title ENV. COOR. Phone (216) 823-6150
Comments _____
Sales Representative Name TIM DISS Number 3022 Branch No. 4-040-03

SK USE ONLY ☐ Sample leaked in transit ☐ Survey number did not match sample label ☐ Survey information incomplete

Sample Received _____ Completed Survey Received _____ Survey Logged _____

Comments _____

Analysis Entered By _____ Date _____ Data Verified By _____ Date _____

Sample Draw No. 325

81363-R4505 (REPRINT)
OIL RECOVERY SERVICE
OIL SERVICES FUEL

PREQUALIFICATION EVALUATION

PAGE 1 OF 4
COMPLETED: 01/18/95
REVISED:
RUN: 01/23/95

ACCEPT FOR SHIPMENT

INCH/SUBMITTER: 404003
AKRON

CONTROL #: 235516-9
LAB #: 42851-6
SAMPLE #: 344272

GENERATOR INFORMATION: CUSTOMER NUMBER: 4040-03-9881

AMERICAN STEEL FOUNDRIES
1000 E BROADWAY ST
ALLIANCE, OH 44601

ATTN: TERRY BRADWAY

BRANCH: 404003 - AKRON

GENERAL DESCRIPTION: OIL H2O

NATURE OF BUSINESS: FOUNDRY

FACILITY ADDRESS: MANIFEST

1000 E BROADWAY ST

ALLIANCE, OH 44601

S.I.C.:

STATUS: LQG

BILLING ADDRESS:

PROCESS DESCRIPTION: DRAIN MACHINE

GENERATION AMOUNT: 55 GALLONS YEARLY

P.O. #:

DATE SURVEY SIGNED: 12/06/94

CONTACT: TERRY BRADWAY

TITLE: ENV COOR

PHN: 216-822-6150

SURVEY COMMENTS:

CHECK FOR SK OILY WATER

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

81363-R4505 (REPRINT)
OIL RECOVERY SERVICE
OIL SERVICES FUEL

PREQUALIFICATION EVALUATION

PAGE 2 OF 4
COMPLETED: 01/18/95
REVISED:
RUN: 01/23/95

ACCEPT FOR SHIPMENT

INCH/SUBMITTER: 404003
ALRON

CONTROL #: 235516-9
LAB #: 42851-6
SAMPLE #: 344272

CORPORATE REVIEW:

DISPOSITION: ACCEPT FOR SHIP
REVIEW DATE: 01/08/1995

PART NUMBER: 0082104 WASTE, NON-SPECIFIC
REVIEWERS: MJK

APPROVED FACILITIES:

BRESLUBE
601 RILEY RD
EAST CHICAGO, IN

FED EPA#: IND07704234
STATE EPA#: IND07704234
TELEPHONE: 219-397-1131
STATE AUTH:

SAFETY-KLEEN CORP.
633 E 138TH ST
DOLTON, IL 60419
ILD980613913
0310690006
7088494850
000164

SAFETY-KLEEN CORP.
3700 LAGRANGE ROAD
SMITHFIELD, KY 40068

FED EPA#: KYD053348108
STATE EPA#: KYD053348108
TELEPHONE: 5028452453
STATE AUTH:

APPROVED DOT - SHIPPING DESCRIPTION

0001082 DRUM OR BULK

WASTE OIL AND WATER MIXTURE
(NOT USDOT HAZARDOUS MATERIAL)

US EPA WASTE CODES: NONE
USA

REVIEW COMMENTS:

*
* OK FOR SKOS WASTE WATER.
*
* OK FOR WASTE WATER FUEL
*
* PROPER SHIPPING DESCRIPTION WAS BASED ON THIS SINGLE ANALYSIS. GENERATOR
* MUST CERTIFY THAT SHIPMENT IS NOT HAZARDOUS. PER COMPANY POLICY, FRS
* CUSTOMERS MUST COMPLETE GENERATOR CERTIFICATION WITH EACH SHIPMENT
* AND BRANCH WILL FILE IN CUSTOMER RECORDS.

THIS SERVES AS NOTICE PER 40 CFR 264.12(B) THAT EACH FACILITY NOTED ABOVE
HAS THE APPROPRIATE PERMITS, IS CAPABLE, HAS CAPACITY AND IS WILLING TO
ACCEPT THE MATERIAL AS DESCRIBED IN THE APPROVAL SECTION.

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

ACCEPT FOR SHIPMENT

ANCH/SUBMITTER: 404003
ALLRON

CONTROL #: 235516-9
LAB #: 42851-6
SAMPLE #: 344272

GENERAL ANALYSIS OF TOTAL SAMPLE

COLOR : DK BROWN
WATER CONTENT : 92.7 WT%
NON-VOLATILE RESIDUE: 5.5 WT% DESCRIPTION: OIL
FLAMMABILITY : NO FLASH AT 75 F BY SETAFLASH
FLAMMABILITY : NO FLASH AT 142 F BY SETAFLASH
PH : DIRECT BY METER 6.7
RADIOACTIVITY : NONE DETECTED
COMMENTS: EMS = YES/AQ LAYER IS GRAY/NVR AT 200C = 2.3% OIL

FUEL EVALUATION OF TOTAL SAMPLE

HEAT CONTENT : 800 BTU/LB ASH UPON COMBUSTION : 0.2 WT%
TOTAL FLUORINE F : < 0.1 TOTAL CHLORINE CL: < 0.3 WT%
TOTAL BROMINE BR : < 0.1 TOTAL SULFUR S : < 0.1 WT%
COMMENTS: NO FLASH ON SETA AT 202/TOTAL HALIDES = 3265PPM BY HPLC

METALS CONTENT OF TOTAL SAMPLE (PPM): DIGEST

BY: ICP

SILVER (D011)	AG: <	1	ALUMINUM	AL: <	10
ARSENIC (D004)	AS: <	10	BARIUM (D005)	BA: <	20
BERYLLIUM	BE: <	2	CALCIUM	CA: <	10
CADMIUM (D006)	CD: <	3	COBALT	CO: <	5
CHROMIUM (D007)	CR: <	2	COPPER	CU: <	5
IRON	FE: <	5	MERCURY (D009)	HG: <	10
POTASSIUM	K: <	40	MAGNESIUM	MG: <	8
MANGANESE	MN: <	1	MOLYBDENUM	MO: <	1
SODIUM	NA: <	93	NICKEL	NI: <	5
PHOSPHORUS	P: <	10	LEAD (D008)	PB: <	5
ANTIMONY	SB: <	5	SELENIUM (D010)	SE: <	20
TIN	SN: <	6	TITANIUM	TI: <	10
THALLIUM	TL: <	10	VANADIUM	V: <	2
ZINC	ZN: <	10			

COMMENTS: METALS ON AQ LAYER/COAGULATION = NEGATIVE

GENERAL COMPOSITION:

COMPOSITION BY:

APPEARANCE
(VOL%)

TOTAL
(WT%)

AQUEOUS PHASE (FREE WATER)	92.0	92.0
ORGANIC PHASE (FEEDSTOCK)	8.0	8.0
BOTTOM SLUDGE (SEMISOLIDS)	0.0	0.0
BOTTOM SOLID (SETTLED SOLIDS)	0.0	0.0
TOTAL	100.0	100.0
TOTAL PHASE	SPECIFIC GRAVITY: .984	VISCOSITY (CENTIPOISE): < 50 CPS

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

81363-R4505 (REPRINT)
OIL RECOVERY SERVICE
OIL SERVICES FUEL

PREQUALIFICATION EVALUATION

PAGE 4 OF 4
COMPLETED: 01/18/95
REVISED:
RUN: 01/23/95

ACCEPT FOR SHIPMENT

ANCH/SUBMITTER: 404003
IRON

CONTROL #: 235516-9
LAB #: 42851-6
SAMPLE #: 344272

VOLATILE ORGANIC COMPOSITION OF ORGANIC PHASE BY GAS CHROMATOGRAPHY
SAMPLE PREPARATION METHODS: HEXANE-EXTRACT, CS2-EXTRACT
DETECTION METHODS : ECD, FID, FID

COMPOSITION OF: VOLATILE
ORGANICS
(PPM)
6.3

COMPOUND NAME
PERCHLOROETHYLENE
CODE: PERC CAS NUMBER: 127-18-4

(D039)

TOTAL

6.3

SPECIFIC ORGANIC COMPOSITION
POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

ADDTNL ANALYTICAL INFO: TRACE VOLATILE ORGANICS DETECTED

LABORATORY REVIEW: R SEG CODE: REVIEWERS: MG MG LAB: PREQ NEW CASTLE
RELEASED: 01/16/95 ANALYZED: 01/16/95 SUBMITTED: 12/29/94
COMMENTS: LOW BTU <5000/ZN <10 PPM

THE ANALYSIS CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF
QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN CORP. IN
ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS NOT REQUIRED.

*** ACCEPT FOR SHIPMENT

END OF DOCUMENT

81363-R4505
OIL RECOVERY SERVICE
CELLOCORE

PREQUALIFICATION EVALUATION
MANIFEST INFORMATION

REVISED:
RUN: 01/23/95
CONTROL #: 235516-9
SAMPLE #: 344272

REQUIRED MANIFEST FORM: GN

SAFETY-KLEEN CORP. PROVIDES THIS MANIFESTING INFORMATION FOR INSTRUCTIONAL PURPOSES ONLY. ALL THE INFORMATION IS BELIEVED TO BE ACCURATE, BUT IS KNOWN TO BE INCOMPLETE. FEDERAL AND STATE REGULATIONS AND THE INSTRUCTIONS ON THE MANIFEST FORM SHOULD BE CONSULTED FOR COMPLETE INFORMATION. IN ADDITION, CERTAIN VARIATIONS MAY BE ALLOWED BY REGULATIONS, BUT NEED TO BE APPROVED BY A SAFETY-KLEEN REPRESENTATIVE PRIOR TO SHIPMENT.

UNIFORM HAZARDOUS WASTE MANIFEST	1. GENERATORS US EPA NO.	DOCUMENT NO.	2. PAGE 1	UNDERLINED AREAS ARE REQUIRED
3. GENERATOR NAME AND MAILING ADDRESS CELLOCORE 1341 S CLEVELAND MASSILLON COPLEY OH 44321		A. STATE MANIFEST DOCUMENT NO B. STATE GENERATOR ID		
4. GENERATOR PHONE 216 239 4370				
5. TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.	6. US EPA ID NO ILD984908202	C. ST TRANS ID	D. TRANSPORTER PHONE 2166733340	
7. TRANSPORTER 2 CO NAME	8. US EPA ID NO	E. ST TRANS ID	F. TRANSPORTER PHONE	
9. FACILITY NAME AND SITE ADDRESS SAFETY-KLEEN CORP. 3700 LAGRANGE ROAD SMITHFIELD KY 40068		10. US EPA ID NUMBER KYD053348108	G. FACILITY STATE ID H. FACILITY PHONE 502 845 2453	
11. US DOT DESCRIPTION A. WASTE OIL AND WATER MIXTURE (NOT USDOT HAZARDOUS MATERIAL)		CONTAINER	I. WASTE NO	
J. ADDITIONAL DESCRIPTION FOR THE MATERIALS LISTED ABOVE		K. HANDLING CODES		
15. SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION EMERGENCY RESP# 708-888-4660				



safety-kleen® MATERIAL SURVEY

SK USE ONLY

SK Survey No.

344272

4-040-03-
SAFETY-KLEEN CUSTOMER NUMBER

SK USE ONLY

Control No. _____

LINE OF BUSINESS FRS SKOS

Lab No. _____

A Generator Name American Steel FoundriesNature of Business Foundry S.I.C. No. _____

ID Numbers: Federal EPA _____ State _____ ID _____ State _____ ID _____

Status: ☒ Large Quantity Generator (LQG) ☐ Small Quantity Generator (SQG) ☐ Conditionally Exempt Small Quantity Generator (CESQG)B Facility Street Address (No P.O. Boxes) ☐ Manifest Address Billing Name & Address (If Different) ☐ Manifest Address1000 E Broadway St
City Alliance State Oh Zip 44001

City _____ State _____ Zip _____

C General Description of Material Oil, H₂OProcess Description Drain MachineGeneration Amount 55 GallonsPer ☐ Week ☐ Month ☐ Quarter ☒ Year ☐ One Time OnlyGallons On Hand 55 ☒ Drums ☐ BulkShipping Schedule 52 ☒ Drums ☐ BulkPhysical Description: Color: BRN. GRAY

Percent Solids that Could Not be Sampled _____

pH Range ☐ <=2.0 ☐ 2-4 ☒ 4-10 ☐ 10-12.5 ☐ >=12.5Layers or Phases ☐ One ☒ Two ☐ ThreePhysical State ☒ Liquid ☐ Paste ☐ SolidLiquid Viscosity ☒ Low ☐ Medium ☐ HighD Material Composition ☐ Vol % ☐ Wt % Max TypicalOil 2%H₂O 98%

TOTAL (Typical should not exceed 100%) 100 %

E Attach material safety data sheets (MSDS) for material components and any current EP Toxic, TCLP, or other analysis of the material.

☐ MSDS attached ☐ EP Toxic analysis attached ☐ TCLP analysis attached ☐ Other Analysis attached ☒ No attachments

F-1 Determine if any of the following prohibited substances may be in the material. MUST BE COMPLETED!

- ☐ Yes ☒ No DOT Radioactives, Explosives, or materials forbidden from transport.
- ☐ Yes ☒ No TSCA regulated materials, Chlorinated biphenyls (PCB), Brominated biphenyls (PBB), Chlorinated dibenzodioxins or furans.
- ☐ Yes ☒ No Products used as pesticides, herbicides, insecticides or by-products of pesticide manufacture.
- ☐ Yes ☒ No Human carcinogens above exclusion levels as defined by OSHA (Ref. 29 CFR 1910.1001-).
- ☐ Yes ☒ No Reactive components (Sulfides, Cyanides, Shock sensitive materials, Pyrophoric compounds).
- ☐ Yes ☒ No Biological hazards (such as Pathogenic materials, Infectious agents, Etiologic agents, USEPA Medical Waste).

F-2 Determine if any of the following restricted substances may be in the material. MUST BE COMPLETED!

- ☐ Yes ☒ No Toxic metals (Arsenic, Barium, Beryllium, Cadmium, Chromium, Lead, Mercury, Nickel, Selenium, Silver, Thallium).
- ☐ Yes ☒ No Water or amine-reactive components (such as unreacted Isocyanate monomers and resins, Acid chlorides, Anhydrides, Epoxides).

F-3 If yes, then identify substances and concentration _____

G DOT Hazardous Material Description ☐ Reportable Quantity (Lbs): ☐ 5000 ☐ 1000 ☐ 100 ☐ 10 ☐ 1

Proper Shipping Name _____

Hazard Class _____ UN/NA Number _____ P.G. _____ ☐ Not DOT Hazardous Material ☒ Not sureSK USE ONLY ☐ Accepted for Analysis ☐ Accepted Conditionally ☐ Suspended for More Information ☐ Rejected

Comments _____

Safety Evaluated By _____ Date _____

LABORATORY

344272

IS THIS MATERIAL A RCRA "HAZARDOUS WASTE"? (SEE INSTRUCTIONS)

CHECK ONE
BOX ON LEFTSECTION
H-1

1. For hazardous wastes, if waste is a "listed" waste, such as "spent solvent" (F001-5), then show the applicable EPA Waste Codes:

☐ F001 ☐ F002 ☐ F003 ☐ F004 ☐ F005 ☐ F006 ☐ K086 Other, specify _____☐ Not Applicable

2. For all hazardous wastes, the generator must determine if waste exhibits a characteristic of a hazardous waste, either based on knowledge or testing. Based on this determination, show all applicable EPA Waste Codes.

☐ D001 ☐ D002 ☐ D003 ☐ D004 ☐ D005 ☐ D006 ☐ D007 ☐ D008 ☐ D009 ☐ D010 ☐ D011☐ Not Applicable3. Based on Land Disposal Restrictions, does waste have a technology-based treatment standard? (Ref. 40 CFR 268) ☐ Not sure ☐ Yes ☐ NoIf yes, then show all applicable technology codes: ☐ DEACT ☐ RORGS ☐ FSUBS ☐ INCIN Other, specify _____4. List all applicable State Waste Codes required by generating facility state: _____ ☐ None required ☐ Not sureSECTION
H-21. Is this material exempt from waste regulations under RCRA (i.e., not a "solid waste")? (Ref. 40 CFR 261) ☐ Yes (Skip to 5) ☐ No2. Is this waste an "used oil" (used petroleum oil) for fuel or recovery, not disposal? (Ref. 40 CFR 279) ☒ Yes (Skip to 5) ☐ No3. Is this waste exempt from regulation as a hazardous waste? If yes, explain why in Comments. ☐ Yes (Skip to 5) ☐ No

4. For all other "non-hazardous" wastes, submit survey with Toxicity Characteristic Leaching Procedure (TCLP) analysis results. If TCLP analysis is not available, then contact a Safety-Kleen representative about obtaining this analysis.

5. List all applicable State Waste Codes required by generating facility state: _____ ☐ None required ☐ Not sureSECTION
H-3

Show SK Codes for all regulated chemicals listed in the Reference Table on the back page which can be present in material, even in trace amounts.

NOT
SURE☐ None presentAre any of these chemicals used as solvents? ☐ Yes ☐ No Are these solvents used to remove oil, grease, or wax? ☐ Yes ☐ No

I Safety-Kleen Corp. requires a representative sample and charges a fee for the prequalification of all new material. P.O. No. _____

Type of sample: ☐ From Line ☐ From Tank ☒ Composite of 1 drums Sample taken by ☐ Customer ☒ Safety-Kleen Representative

J Generator Certification (Not a waste handling agreement):

On behalf of the Generator, I hereby warrant, represent, and certify that: all information submitted in this document is true, accurate, and complete; all known or suspected hazards have been disclosed; and, I am a duly authorized employee of the Generator.

Generator agrees to indemnify and hold Safety-Kleen Corp. and its subsidiaries harmless for any claims, liabilities, damages, and costs including, but not limited to, attorney's fees, arising out of or in any way related to breach of the above warranty by the Generator.

Name Terry Bradway Title Env. Coord.Signature X [Signature] Date 12-6-94 Phone (216) 822-6150Contact Terry Bradway Title Env. Coord. Phone (216) 823-6100

Comments _____

Sales Representative Name Tim Diers Number 3022 Branch No. 4-040-03SK USE ONLY ☐ Sample leaked in transit ☐ Survey number did not match sample label ☐ Survey information incomplete

Sample Received _____ Completed Survey Received _____ Survey Logged _____

Comments _____

Analysis Entered By _____ Date _____ Data Verified By _____ Date _____

81363-R4845
PARTS WASHER SERVICE
FLUID RECOVERY SERVICES

PREQUALIFICATION EVALUATION

PAGE 1 OF 3
COMPLETED: 02/28/95
REVISED:
RUN: 03/01/95

ACCEPT FOR SHIPMENT

BRANCH/SUBMITTER: 404003
AKRON

CONTROL #: 237398-1
LAB #: 44747-8
SURVEY #: 512156

GENERATOR INFORMATION: CUSTOMER NUMBER: 4040-03-9889

AMERICAN STEEL FOUNDRIES
1001 E BROADWAY
ALLIANCE, OH 44601

ATTN: TERRY BRADWAY

BRANCH: 404003 - AKRON

GENERAL DESCRIPTION: MINERAL SPIRITS COOLANT H2O
NATURE OF BUSINESS: STEEL FOUNDRIES S.I.C.: 3325 STATUS: LQG
FEDERAL EPA ID: OHD981090418 STATE ID(S):
FACILITY ADDRESS: MANIFEST BILLING ADDRESS:
1001 E BROADWAY
ALLIANCE, OH 44601
PROCESS DESCRIPTION: REMOVED FROM PARTS CLEANER
GENERATION AMOUNT: 15 GALLONS ONE TIME ONLY PART#:
P.O. #: DATE SURVEY SIGNED: 02/10/95
CONTACT: TERRY BRADWAY TITLE: ENV MGR PHN: 216-823-6150
CORPORATE REVIEW:
DISPOSITION: ACCEPT FOR SHIP PART NUMBER: 0082101 WASTE, SPEC. FUELS-55
REVIEW DATE: 02/28/1995 REVIEWERS: MJK
APPROVED FACILITIES:
SAFETY-KLEEN CORP. SAFETY-KLEEN CORP.
1722 COOPER CREEK ROAD 3700 LAGRANGE ROAD
DENTON, TX 76208 SMITHFIELD, KY 40068
FED EPA#: TXD077603371 KYD053348108
STATE EPA#: 65124 5028452453
TELEPHONE: 8173832611
STATE AUTH:
APPROVED DOT - SHIPPING DESCRIPTION
0003097 DRUM OR BULK RQ WASTE COMBUSTIBLE LIQUID, N.O.S.
(ALIPHATIC AND AROMATIC HYDROCARBONS)
NA1993 PG III (D018)(ERG#27)
STATE/PROV. CODES: TX OUTS211H
US EPA WASTE CODES: D018 D039 D040
USA
REVIEW COMMENTS:

* OK FOR FUEL.

THIS SERVES AS NOTICE PER 40 CFR 264.12(B) THAT EACH FACILITY NOTED ABOVE
HAS THE APPROPRIATE PERMITS, IS CAPABLE, HAS CAPACITY AND IS WILLING TO
ACCEPT THE MATERIAL AS DESCRIBED IN THE APPROVAL SECTION.

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

81363-R4845
PARTS WASHER SERVICE
FLUID RECOVERY SERVICES

PREQUALIFICATION EVALUATION

PAGE 2 OF 3
COMPLETED: 02/28/95
REVISED:
RUN: 03/01/95

ACCEPT FOR SHIPMENT

ANCH/SUBMITTER: 404003
ARON

CONTROL #: 237398-1
LAB #: 44747-8
SURVEY #: 512156

GENERAL ANALYSIS OF TOTAL SAMPLE

COLOR : GRAY
WATER CONTENT : 20.3 WT%
NON-VOLATILE RESIDUE: 7.9 WT% DESCRIPTION: SOLID
FLAMMABILITY : NO FLASH AT 75 F BY SETAFLASH
FLAMMABILITY : NO FLASH AT 142 F BY SETAFLASH
PH : EXTRACT BY METER 11.7
NEUTRALIZATION : 0.88 WT% OR 8.8 G/KG ALKALINITY AS NAOH
RADIOACTIVITY : NONE DETECTED

FUEL EVALUATION OF TOTAL SAMPLE

HEAT CONTENT : 15700 BTU/LB ASH UPON COMBUSTION : 1.8 WT%
TOTAL FLUORINE F : < 0.1 WT% TOTAL CHLORINE CL : < 0.1 WT%
TOTAL BROMINE BR : < 0.1 WT% TOTAL SULFUR S : < 0.1 WT%

GENERAL COMPOSITION:

COMPOSITION BY:

APPEARANCE
(VOL%)

TOTAL
(WT%)

AQUEOUS PHASE (FREE WATER)	0.0	0.0
ORGANIC PHASE (FEEDSTOCK)	0.0	0.0
BOTTOM SLUDGE (SEMISOLIDS)	100.0	100.0
BOTTOM SOLID (SETTLED SOLIDS)	0.0	0.0
TOTAL	100.0	100.0
TOTAL PHASE SPECIFIC GRAVITY: .909	VISCOSITY (CENTIPOISE): <	500 CPS

SPECIFIC COMPOSITION OF TOTAL SAMPLE

COMPOSITION OF:

TOTAL
SAMPLE
(WT%)

TOTAL
SAMPLE
(WT%)

WATER CONTENT	20.3	20.3
NON-VOLATILE RESIDUE	7.9	7.9
VOLATILE ORGANICS BY DIFFERENCE	71.8	71.8
TOTAL	100.0	100.0

VOLATILE ORGANIC COMPOSITION OF TOTAL SAMPLE BY GAS CHROMATOGRAPHY

SAMPLE PREPARATION METHODS: CS2-EXTRACT
DETECTION METHODS : FID, FID

COMPOSITION OF:

VOLATILE
ORGANICS
(WT%)

TOTAL
SAMPLE
(WT%)

COMPOUND NAME		
MEDIUM-BOILING ALIPHATIC HYDROCARBONS (C9-C13)	92.2	66.2
CODE: MHC CAS NUMBER: 8030-30-6		
HIGH-BOILING ALIPHATIC HYDROCARBONS (C14-C20)	7.8	5.6
CODE: HHC CAS NUMBER:		
TOTAL	100.0	71.8

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

81363-R4845
PARTS WASHER SERVICE
FLUID RECOVERY SERVICES

PREQUALIFICATION EVALUATION

PAGE 3 OF 3
COMPLETED: 02/28/95
REVISED:
RUN: 03/01/95

ACCEPT FOR SHIPMENT

E INCH/SUBMITTER: 404003
AKRON

CONTROL #: 237398-1
LAB #: 44747-8
SURVEY #: 512156

SPECIFIC ORGANIC COMPOSITION

POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

LABORATORY REVIEW: A SEG CODE: REVIEWERS: MG MG LAB: PREQ NEW CASTLE
RELEASED: 02/24/95 ANALYZED: 02/24/95 SUBMITTED: 02/14/95

THE ANALYSIS CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF
QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN CORP. IN
ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS REQUIRED.

*** ACCEPT FOR SHIPMENT

END OF DOCUMENT

TO: SAFETY-KLEEN CORP.
3700 LAGRANGE ROAD
SMITHFIELD, KY 40068

EPA ID: KYD053348108

UNDER MANIFEST NUMBER _____ LINE NUMBER _____
THE GENERATOR NOTED BELOW IS SHIPPING TO YOU A RESTRICTED WASTE UNDER
FEDERAL AND STATE LAND DISPOSAL RESTRICTION REGULATIONS.
IN ACCORDANCE WITH THESE REGULATIONS, THE GENERATOR HEREBY PROVIDES
NOTICE THAT THE WASTE IS RESTRICTED AND THE EPA WASTE CODES
AND APPROPRIATE TREATMENT STANDARDS ARE AS FOLLOWS:

HAZARDOUS WASTE CODES: D018 D039 D040

TREATABILITY GROUP: NONWASTEWATERS

UNIVERSAL TREATMENT STANDARDS (U.T.S) TREATMENT STANDARD CONCENTRATION
REGULATED CONSTITUENT - COMMON NAME (TOTAL MG/L, UNLESS NOTED AS "TCLEF")

GENERATOR IS NOT REQUIRED TO LIST UNDERLYING CONSTITUENTS BECAUSE TREATER WILL
MONITOR FOR ALL 216 REGULATED CONSTITUENTS PRIOR TO LAND DISPOSAL. **

EPA WASTE CODE	WASTE DESCRIPTION AND TREATMENT/REGULATORY SUBCATEGORY	TREATMENT STANDARD CONCENTRATION OR TECHNOLOGY CODE
D018	BENZENE	10 MG/KG ****
D039	TETRACHLOROETHYLENE	6.0 MG/KG ****
D040	TRICHLOROETHYLENE	6.0 MG/KG ****

NOTES: * THESE TREATMENT STANDARDS DO NOT PRECLUDE SOLVENT RECOVERY OR
USE AS FUEL PRIOR TO LAND DISPOSAL.
** NEW TREATMENT STANDARDS UNDER FEDERAL RULES EFFECTIVE 12-19-94.
*** TREATMENT STANDARDS APPLICABLE IN CERTAIN HSWA-AUTHORIZED STATES.
**** AND MEET UNIVERSAL TREATMENT STANDARDS EFFECTIVE 12-19-94.

GENERATOR NAME: American Steel

EPA ID: _____

GENERATOR SIGNATURE (OPTIONAL): _____

040981090418

NAME & TITLE (OPTIONAL): _____

SAFETY-KLEEN SAMPLE NUMBER: 512156

CONTROL NUMBER: 237398-1

81363-R4845

SAFETY-KLEEN CORP.
NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

PAGE 1 OF 1

TO: SAFETY-KLEEN CORP.
3700 LAGRANGE ROAD
SMITHFIELD, KY 40068

EPA ID: KYD053348108

UNDER MANIFEST NUMBER _____ LINE NUMBER _____
THE GENERATOR NOTED BELOW IS SHIPPING TO YOU A RESTRICTED WASTE UNDER
FEDERAL AND STATE LAND DISPOSAL RESTRICTION REGULATIONS.
IN ACCORDANCE WITH THESE REGULATIONS, THE GENERATOR HEREBY PROVIDES
NOTICE THAT THE WASTE IS RESTRICTED AND THE EPA WASTE CODES
AND APPROPRIATE TREATMENT STANDARDS ARE AS FOLLOWS:

HAZARDOUS WASTE CODES: D018 D039 D040

TREATABILITY GROUP: NONWASTEWATERS

UNIVERSAL TREATMENT STANDARDS (U.T.S) TREATMENT STANDARD CONCENTRATION
REGULATED CONSTITUENT - COMMON NAME (TOTAL MG/L, UNLESS NOTED AS "TCLP")-----
GENERATOR IS NOT REQUIRED TO LIST UNDERLYING CONSTITUENTS BECAUSE TREATER WILL
MONITOR FOR ALL 216 REGULATED CONSTITUENTS PRIOR TO LAND DISPOSAL. **

EPA WASTE CODE	WASTE DESCRIPTION AND TREATMENT/REGULATORY SUBCATEGORY	TREATMENT STANDARD CONCENTRATION OR TECHNOLOGY CODE
D018	BENZENE	10 MG/KG ****
D039	TETRACHLOROETHYLENE	6.0 MG/KG ****
D040	TRICHLOROETHYLENE	6.0 MG/KG ****

NOTES: * THESE TREATMENT STANDARDS DO NOT PRECLUDE SOLVENT RECOVERY OR
USE AS FUEL PRIOR TO LAND DISPOSAL.
** NEW TREATMENT STANDARDS UNDER FEDERAL RULES EFFECTIVE 12-19-94.
*** TREATMENT STANDARDS APPLICABLE IN CERTAIN HSWA-AUTHORIZED STATES.
**** AND MEET UNIVERSAL TREATMENT STANDARDS EFFECTIVE 12-19-94.

GENERATOR NAME: American Steel

EPA ID: _____

GENERATOR SIGNATURE (OPTIONAL): _____

04098109041

NAME & TITLE (OPTIONAL): _____

SAFETY-KLEEN SAMPLE NUMBER: 512156

CONTROL NUMBER: 237398-1



Safety-Kleen MATERIAL SURVEY

SK USE ONLY

4-040-039811

SAFETY-KLEEN CUSTOMER NUMBER

SK LINE OF BUSINESS #
(EX. USE 24 FOR FRS)

SK Survey No.

512156

SK USE ONLY

Control No. _____

Lab No. _____

A Generator Name Amesbury, MA
 Nature of Business Steel Fabrication S.I.C. No. 3325
 ID Numbers: Federal EPA 04D981090412 State MA ID 12 State MA ID 12
 Status: ☒ Large Quantity Generator (LQG) ☐ Small Quantity Generator (SQG) ☐ Conditionally Exempt Small Quantity Generator (CESQG)

B Facility Street Address (No P.O. Boxes) ☒ Manifest Address Billing Name & Address (If Different) ☐ Manifest Address
1001 E Broadway
 City Allston State MA Zip 02134 City _____ State _____ Zip _____

C General Description of Material Mineral Spirits
Coolant
 Process Description Removal from Parts
Cleaner
 Generation Amount 15 Gallons
 Per ☐ Week ☐ Month ☐ Quarter ☐ Year ☒ One Time Only
 Gallons On Hand 15 ☒ Drums ☐ Bulk
 Shipping Schedule One Time ☒ Drums ☐ Bulk
 Physical Description: Color: Light Purple
 Percent Solids that Could Not be Sampled 0
 pH Range ☐ <= 2.0 ☐ 2-4 ☒ 4-10 ☐ 10-12.5 ☐ >= 12.5
 Layers or Phases ☐ One ☒ Two ☐ Three
 Physical State ☒ Liquid ☐ Paste ☐ Solid
 Liquid Viscosity ☒ Low ☐ Medium ☐ High

D Material Composition ☐ Vol % ☐ Wt % Max Typical
Mineral Spirits _____ 5%
Coolant _____ 5%
170 _____ 90%
 TOTAL (Typical should not exceed 100%) 100 %

E Attach material safety data sheets (MSDS) for material components and any current EP Toxic, TCLP, or other analysis of the material.
☐ MSDS attached ☐ EP Toxic analysis attached ☐ TCLP analysis attached ☐ Other Analysis attached ☒ No attachments

F-1 Determine if any of the following prohibited substances may be in the material. MUST BE COMPLETED!
☐ Yes ☒ No DOT Radioactives, Explosives, or materials forbidden from transport.
☐ Yes ☒ No TSCA regulated materials, Chlorinated biphenyls (PCB), Brominated biphenyls (PBB), Chlorinated dibenzodioxins or furans.
☐ Yes ☒ No Products used as pesticides, herbicides, insecticides or by-products of pesticide manufacture.
☐ Yes ☒ No Human carcinogens above exclusion levels as defined by OSHA (Ref. 29 CFR 1910.1001-).
☐ Yes ☒ No Reactive components (Sulfides, Cyanides, Shock sensitive materials, Pyrophoric compounds).
☐ Yes ☒ No Biological hazards (such as Pathogenic materials, Infectious agents, Etiologic agents, USEPA Medical Waste).

F-2 Determine if any of the following restricted substances may be in the material. MUST BE COMPLETED!
☐ Yes ☒ No Toxic metals (Arsenic, Barium, Beryllium, Cadmium, Chromium, Lead, Mercury, Nickel, Selenium, Silver, Thallium).
☐ Yes ☒ No Water or amine-reactive components (such as unreacted Isocyanate monomers and resins, Acid chlorides, Anhydrides, Epoxides).

F-3 If yes, then identify substances and concentration _____

G DOT Hazardous Material Description ☐ Reportable Quantity (Lbs): ☐ 5000 ☐ 1000 ☐ 100 ☐ 10 ☐ 1
 Proper Shipping Name _____
 Hazard Class _____ UN/NA Number _____ P.G. _____ ☐ Not DOT Hazardous Material ☒ Not sure

USE ONLY ☐ Accepted for Analysis ☐ Accepted Conditionally ☐ Suspended for More Information ☐ Rejected
 Comments _____

Safety Evaluated By _____ Date _____

GENERATOR

H EPA Waste Description and Treatment Standards (COMPLETE ALL QUESTIONS WITHIN ONE SECTION ONLY).

SK Survey No.

512156

IS THIS MATERIAL A RCRA "HAZARDOUS WASTE"? (Ref. 40 CFR 261)

☒ CHECK ONE BOX ON LEFT

SECTION
H-1

1. For hazardous wastes, if waste is a "listed" waste, such as "spent solvent" (F001-5), then show the applicable EPA Waste Codes:

☐ F001 ☐ F002 ☐ F003 ☐ F004 ☐ F005 ☐ F006 ☐ K086 Other, specify _____

☐ Not Applicable

2. For all hazardous wastes, the generator must determine if waste exhibits a characteristic of a hazardous waste, either based on knowledge or testing. Based on this determination, show all applicable EPA Waste Codes.

☐ D001 ☐ D002 ☐ D003 ☐ D004 ☐ D005 ☐ D006 ☐ D007 ☐ D008 ☐ D009 ☐ D010 ☐ D011

☐ Not Applicable

3. Based on Land Disposal Restrictions, does waste have a technology-based treatment standard? (Ref. 40 CFR 268) ☐ Not sure ☐ Yes ☐ No

If yes, then show all applicable technology codes: ☐ DEACT ☐ RORGS ☐ FSUBS ☐ INCIN Other, specify _____

4. List all applicable State Waste Codes required by generating facility state: _____ ☐ None required ☐ Not sure

SECTION
H-2

1. Is this material exempt from waste regulations under RCRA (i.e., not a "solid waste" per 40 CFR 261.2)? ☐ Yes (Skip to 5) ☐ No

2. Is this waste an exempt "used oil", for fuel or recovery, not disposal? (Ref. 40 CFR 279) ☐ Yes (Skip to 5) ☐ No

3. Is this waste exempt from regulation as a hazardous waste, per 261.4? If yes, explain why in Comments. ☐ Yes (Skip to 5) ☐ No

4. For all other "non-hazardous" wastes, submit survey with Toxicity Characteristic Leaching Procedure (TCLP) analysis results or Generator Waste Determination Certification.

5. List all applicable State Waste Codes required by generating facility state: _____ ☐ None required ☐ Not sure

SECTION
H-3

When a generator is unable to identify the proper characterization of a waste, to avoid delays and extra expense, Safety-Kleen's representative will draw a waste sample for TCLP analysis. A prequalification sample will be analyzed and, if necessary based upon that analysis, a TCLP analysis will also be performed.

I Safety-Kleen Corp. requires a representative sample and charges a fee for the prequalification of all new material. P.O. No. _____
Type of sample: ☐ From Line ☐ From Tank ☒ Composite of 1 drums Sample taken by ☐ Customer ☒ Safety-Kleen Representative

J Generator Certification (Not a waste handling agreement):
On behalf of the Generator, I hereby warrant, represent, and certify that: all information submitted in this document is true, accurate, and complete; all known or suspected hazards have been disclosed; and, I am a duly authorized employee of the Generator.
Generator agrees to indemnify and hold Safety-Kleen Corp. and its subsidiaries harmless for any damages, assessments, penalties, costs, attorney's fees, etc., arising out of, or in any way related to breach of the above warranty by the Generator.
Name Terry Broadway Title Env. Mgr
Signature X Terry Broadway Date 2-10-95 Phone (214) 823-4150
Contact Terry Broadway Title Env. Mgr Phone (214) 823-4150
Comments _____
Sales Representative Name Tim Doss Number 3022 Branch No. 4-040-03

SK USE ONLY ☐ Sample leaked in transit ☐ Survey number did not match sample label ☐ Survey information incomplete

Sample Received _____ Completed Survey Received _____ Survey Logged _____

Comments _____

Analysis Entered By _____ Date _____ Data Verified By _____ Date _____

81 3-R4845
OIL RECOVERY SERVICE
OIL SERVICES FUEL

PREQUALIFICATION EVALUATION

PAGE 1 OF 4
COMPLETED: 02/24/95
REVISED:
RUN: 02/25/95

ACCEPT FOR SHIPMENT

CONTROL #: 237410-6
LAB #: 44759-4
SURVEY #: 512155

BRANCH/SUBMITTER: 404003
AKRON

GENERATOR INFORMATION: CUSTOMER NUMBER: 4040-03-9884 9889

AMERICAN STEEL FOUNDRIES
1001 E BROADWAY ST
ALLIANCE, OH 44601

ATTN: TERRY BRADWAY

BRANCH: 404003 - AKRON

GENERAL DESCRIPTION: WASTE OIL
NATURE OF BUSINESS: STEEL FOUNDRY
FEDERAL EPA ID: OHD981090418 STATE ID(S): S.I.C.: 3325 STATUS: SQG
FACILITY ADDRESS: MANIFEST BILLING ADDRESS:
1001 E BROADWAY ST
ALLIANCE, OH 44601
PROCESS DESCRIPTION: DRAIN EQUIPMENT
GENERATION AMOUNT: 110 GALLONS MONTHLY PART#: DATE SURVEY SIGNED: 02/10/95
P.O. #: TITLE: ENVIRONMENTAL MGR PHN: 216-823-6150
CONTACT: TERRY BRADWAY
SURVEY COMMENTS:
CHECK FOR SKOS

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

8 363-R4845
RECOVERY SERVICE
OIL SERVICES FUEL

PREQUALIFICATION EVALUATION

PAGE 2 OF 4
COMPLETED: 02/24/95
REVISED:
RUN: 02/25/95

ACCEPT FOR SHIPMENT

BRANCH/SUBMITTER: 404003
AKRON

CONTROL #: 237410-6
LAB #: 44759-4
SURVEY #: 512155

CORPORATE REVIEW:
DISPOSITION: ACCEPT FOR SHIP
REVIEW DATE: 02/24/1995

PART NUMBER: 0082107 WASTE, OIL FUEL -55
REVIEWERS: MJK

APPROVED FACILITIES:

BRESLUBE
601 RILEY RD
EAST CHICAGO, IN
FED EPA#: IND07704234
STATE EPA#: IND07704234
TELEPHONE: 219-397-1131
STATE AUTH:

SAFETY-KLEEN CORP.
633 E 138TH ST
DOLTON, IL 60419
ILD980613913
0310690006
7088494850
000164

SAFETY-KLEEN CORP.
3700 LAGRANGE ROAD
SMITHFIELD, KY 40068
FED EPA#: KYD053348108
STATE EPA#: KYD053348108
TELEPHONE: 5028452453
STATE AUTH:

APPROVED DOT - SHIPPING DESCRIPTION
0001073 DRUM OR BULK WASTE OIL
(NOT USDOT HAZARDOUS MATERIAL)

US EPA WASTE CODES: NONE
USA

REVIEW COMMENTS:

*
* OK FOR SKOS USED OIL.
*
* OK FOR WASTE OIL FUEL.
*
* PROPER SHIPPING DESCRIPTION WAS BASED ON THIS SINGLE ANALYSIS. GENERATOR
* MUST CERTIFY THAT SHIPMENT IS NOT HAZARDOUS. PER COMPANY POLICY, FRS
* CUSTOMERS MUST COMPLETE GENERATOR CERTIFICATION WITH EACH SHIPMENT
* AND BRANCH WILL FILE IN CUSTOMER RECORDS.

THIS SERVES AS NOTICE PER 40 CFR 264.12(B) THAT EACH FACILITY NOTED ABOVE
HAS THE APPROPRIATE PERMITS, IS CAPABLE, HAS CAPACITY AND IS WILLING TO
ACCEPT THE MATERIAL AS DESCRIBED IN THE APPROVAL SECTION.

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

P1363-R4845
RECOVERY SERVICE
C.I.L SERVICES FUEL

PREQUALIFICATION EVALUATION

PAGE 3 OF 4
COMPLETED: 02/24/95
REVISED:
RUN: 02/25/95

ACCEPT FOR SHIPMENT

BRANCH/SUBMITTER: 404003
AKRON

CONTROL #: 237410-6
LAB #: 44759-4
SURVEY #: 512155

GENERAL ANALYSIS OF TOTAL SAMPLE

COLOR : DK BROWN
WATER CONTENT : < 0.1 WT%
NON-VOLATILE RESIDUE: 98.8 WT% DESCRIPTION: OIL
FLAMMABILITY : NO FLASH AT 75 F BY SETAFLASH
FLAMMABILITY : NO FLASH AT 142 F BY SETAFLASH
PH : EXTRACT BY METER 7.1
RADIOACTIVITY : NONE DETECTED
COMMENTS: NVR AT 200C = 82.4% OIL/COAGULATION = NEGATIVE

FUEL EVALUATION OF TOTAL SAMPLE

HEAT CONTENT : 18900 BTU/LB ASH UPON COMBUSTION : 0.1 WT%
TOTAL FLUORINE F : < 0.1 WT% TOTAL CHLORINE CL: 0.1 WT%
TOTAL BROMINE BR: < 0.1 WT% TOTAL SULFUR S : 0.2 WT%
COMMENTS: NO FLASH ON SETA AT 202/TOTAL HALIDES = 1224PPM BY HPLC

GENERAL COMPOSITION:

COMPOSITION BY:

APPEARANCE
(VOL%)

TOTAL
(WT%)

AQUEOUS PHASE (FREE WATER)	0.0	0.0
ORGANIC PHASE (FEEDSTOCK)	100.0	100.0
BOTTOM SLUDGE (SEMISOLIDS)	0.0	0.0
BOTTOM SOLID (SETTLED SOLIDS)	0.0	0.0

TOTAL	100.0	100.0
-------	-------	-------

TOTAL PHASE SPECIFIC GRAVITY: .900 VISCOSITY (CENTIPOISE): < 50 CPS

VOLATILE ORGANIC COMPOSITION OF ORGANIC PHASE BY GAS CHROMATOGRAPHY

SAMPLE PREPARATION METHODS: HEXANE-EXTRACT, CS2-EXTRACT
DETECTION METHODS : ECD, FID, FID

COMPOSITION OF:

VOLATILE
ORGANICS
(PPM)

COMPOUND NAME		
PERCHLOROETHYLENE	(D039)	51.1
CODE: PERC CAS NUMBER: 127-18-4		
TRICHLOROETHYLENE	(D040)	24.6
CODE: TCE CAS NUMBER: 79-01-6		
TRICHLOROETHANE, 1,1,1- (ODS)		1.7
CODE: 111 CAS NUMBER: 71-55-6		
TOTAL		77.4

SPECIFIC ORGANIC COMPOSITION

POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

ADDITNL ANALYTICAL INFO: SAMPLE IS TRACE VOLATILE ORGANICS

LABORATORY REVIEW: A SEG CODE: REVIEWERS: TLM TLM LAB: PREQ NEW CASTLE
RELEASED: 02/23/95 ANALYZED: 02/23/95 SUBMITTED: 02/14/95

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

81363-R4845
C RECOVERY SERVICE
C SERVICES FUEL

PREQUALIFICATION EVALUATION

PAGE 4 OF 4
COMPLETED: 02/24/95
REVISED:
RUN: 02/25/95

ACCEPT FOR SHIPMENT

BRANCH/SUBMITTER: 404003
AKRON

CONTROL #: 237410-6
LAB #: 44759-4
SURVEY #: 512155

THE ANALYSIS CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF
QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN CORP. IN
ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS NOT REQUIRED.

*** ACCEPT FOR SHIPMENT

END OF DOCUMENT

A Generator Name American St. Ref. S.I.C. No. 3325
Nature of Business St. Ref.
ID Numbers: Federal EPA 040981090418 State ID State ID
Status: ☒ Large Quantity Generator (LQG) ☐ Small Quantity Generator (SQG) ☐ Conditionally Exempt Small Quantity Generator (CESQG)

B Facility Street Address (No P.O. Boxes) ☐ Manifest Address Billing Name & Address (If Different) ☐ Manifest Address
1000 Broadway St
City Albany State NY Zip 12204
City State Zip

C General Description of Material Waste Oil
Process Description Trans. Equipment
Generation Amount 100 Gallons
Per ☐ Week ☐ Month ☐ Quarter ☐ Year ☐ One Time Only
Gallons On Hand 500 ☐ Drums ☐ Bulk
Shipping Schedule 12 wks ☐ Drums ☐ Bulk
Physical Description: Color: Black Brown
Percent Solids that Could Not be Sampled 0
pH Range ☐ <= 2.0 ☐ 2-4 ☐ 4-10 ☐ 10-12.5 ☐ >= 12.5
Layers or Phases ☐ One ☐ Two ☐ Three
Physical State ☐ Liquid ☐ Paste ☐ Solid
Liquid Viscosity ☐ Low ☐ Medium ☐ High

D Material Composition ☐ Vol % ☐ Wt % Max Typical
Waste Oil 100%
TOTAL (Typical should not exceed 100%) 100 %

E Attach material safety data sheets (MSDS) for material components and any current EP Toxic, TCLP, or other analysis of the material.
☐ MSDS attached ☐ EP Toxic analysis attached ☐ TCLP analysis attached ☐ Other Analysis attached ☒ No attachments

F-1 Determine if any of the following prohibited substances may be in the material. MUST BE COMPLETED!
☐ Yes ☒ No DOT Radioactives, Explosives, or materials forbidden from transport.
☐ Yes ☒ No TSCA regulated materials, Chlorinated biphenyls (PCB), Brominated biphenyls (PBB), Chlorinated dibenzodioxins or furans.
☐ Yes ☒ No Products used as pesticides, herbicides, insecticides or by-products of pesticide manufacture.
☐ Yes ☒ No Human carcinogens above exclusion levels as defined by OSHA (Ref. 29 CFR 1910.1001-).
☐ Yes ☒ No Reactive components (Sulfides, Cyanides, Shock sensitive materials, Pyrophoric compounds).
☐ Yes ☒ No Biological hazards (such as Pathogenic materials, Infectious agents, Etiologic agents, USEPA Medical Waste).

F-2 Determine if any of the following restricted substances may be in the material. MUST BE COMPLETED!
☐ Yes ☒ No Toxic metals (Arsenic, Barium, Beryllium, Cadmium, Chromium, Lead, Mercury, Nickel, Selenium, Silver, Thallium).
☐ Yes ☒ No Water or amine-reactive components (such as unreacted Isocyanate monomers and resins, Acid chlorides, Anhydrides, Epoxides).

F-3 If yes, then identify substances and concentration

G DOT Hazardous Material Description ☐ Reportable Quantity (Lbs): ☐ 5000 ☐ 1000 ☐ 100 ☐ 10 ☐ 1
Proper Shipping Name
Hazard Class UN/NA Number P.G. ☐ Not DOT Hazardous Material ☒ Not sure

USE ONLY ☐ Accepted for Analysis ☐ Accepted Conditionally ☐ Suspended for More Information ☐ Rejected
Comments

H EPA Waste Description and Treatment Standards (COMPLETE ALL QUESTIONS WITHIN ONE SECTION ONLY).

SK Survey No.

IS THIS MATERIAL A RCRA "HAZARDOUS WASTE"? (Ref. 40 CFR 261)

☒ CHECK ONE BOX ON LEFT

512155

SECTION
H-1

1. For hazardous wastes, if waste is a "listed" waste, such as "spent solvent" (F001-5), then show the applicable EPA Waste Codes:
☐ F001 ☐ F002 ☐ F003 ☐ F004 ☐ F005 ☐ F006 ☐ K086 Other, specify _____ ☐ Not Applicable
2. For all hazardous wastes, the generator must determine if waste exhibits a characteristic of a hazardous waste, either based on knowledge or testing. Based on this determination, show all applicable EPA Waste Codes.
☐ D001 ☐ D002 ☐ D003 ☐ D004 ☐ D005 ☐ D006 ☐ D007 ☐ D008 ☐ D009 ☐ D010 ☐ D011 _____ ☐ Not Applicable
3. Based on Land Disposal Restrictions, does waste have a technology-based treatment standard? (Ref. 40 CFR 268) ☐ Not sure ☐ Yes ☐ No
 If yes, then show all applicable technology codes: ☐ DEACT ☐ RORGS ☐ FSUBS ☐ INCIN Other, specify _____
4. List all applicable State Waste Codes required by generating facility state: _____ ☐ None required ☐ Not sure

SECTION
H-2

1. Is this material exempt from waste regulations under RCRA (i.e., not a "solid waste" per 40 CFR 261.2)? ☐ Yes (Skip to 5) ☐ No
2. Is this waste an exempt "used oil", for fuel or recovery, not disposal? (Ref. 40 CFR 279) ☒ Yes (Skip to 5) ☐ No
3. Is this waste exempt from regulation as a hazardous waste, per 261.4? If yes, explain why in Comments. ☐ Yes (Skip to 5) ☐ No
4. For all other "non-hazardous" wastes, submit survey with Toxicity Characteristic Leaching Procedure (TCLP) analysis results or Generator Waste Determination Certification.
5. List all applicable State Waste Codes required by generating facility state: _____ ☒ None required ☐ Not sure

SECTION
H-3

When a generator is unable to identify the proper characterization of a waste, to avoid delays and extra expense, Safety-Kleen's representative will draw a waste sample for TCLP analysis. A prequalification sample will be analyzed and, if necessary based upon that analysis, a TCLP analysis will also be performed.

- I** Safety-Kleen Corp. requires a representative sample and charges a fee for the prequalification of all new material. P.O. No. _____
- Type of sample: ☐ From Line ☐ From Tank ☒ Composite of 5 drums Sample taken by ☐ Customer ☒ Safety-Kleen Representative

J Generator Certification (Not a waste handling agreement):

On behalf of the Generator, I hereby warrant, represent, and certify that: all information submitted in this document is true, accurate, and complete; all known or suspected hazards have been disclosed; and, I am a duly authorized employee of the Generator.

Generator agrees to indemnify and hold Safety-Kleen Corp. and its subsidiaries harmless for any damages, assessments, penalties, costs, attorney's fees, etc., arising out of, or in any way related to breach of the above warranty by the Generator.

Name Terrey Bradway Title _____

Signature ☒ T.E. Bradway Date 2-10-95 Phone (216) 823-6150

Contact Terrey Bradway Title ENVIRONMENTAL MGR Phone (216) 823-6150

Comments Check for SKOS

Sales Representative Name Tim Diss Number 3022 Branch No. 4-040-03

SK USE ONLY ☐ Sample leaked in transit ☐ Survey number did not match sample label ☐ Survey information incomplete

Sample Received _____ Completed Survey Received _____ Survey Logged _____

Comments _____

Analysis Entered By _____ Date _____ Data Verified By _____ Date _____



American Steel Foundries

1001 EAST BROADWAY * P.O. BOX 2060 * ALLIANCE, OHIO 44601

(216) 823-6150 * FAX NO. (216) 821-4568

January 09, 1995

RECEIVED

JAN 12 1995

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

**CERTIFIED LETTER
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Barbara Mazur

Z 055 522 223

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

Z 055 522 224

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

Progress Report # 11

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

5. After implementation of the Alliance Closure Plan, only in the event that clean closure cannot be achieved, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Alliance Post Closure Plan in accordance with the requirements of 40 C.F.R. # 265.117 through 265.120 and Ohio Admin. Code # 3745-66-17 through 20. If Ohio EPA does not approve the Alliance Post Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or Modified Alliance Post-Closure Plan, in accordance with 40 C.F.R. # 265.118 (d) (4) and (f) and Ohio Admin.. Code # 3745-66-18 (D) (4) and (F). Immediately upon receipt of final approval or modification of the Alliance Post-Closure Plan by Ohio EPA, Defendant shall implement such Plan.

Closure of the Electric Arc Furnace Baghouse Waste Management Unit was undertaken during our plant vacation shutdown in the first two weeks of August 1994. Excavation was performed to the base of the foundations in the entire unit in order to attempt clean closure. A concrete slab was poured over the back filled excavation during the third week of August and a documentation of closure was prepared for submittal in early October.

In his October 12, 1994 letter, Mr. J. F. Oesch, Plant Manager, American Steel Foundries submitted an EAF Closure Activity Report to the Ohio EPA and the U.S. EPA.

In accordance with Mr. John Palmer's instructions to Ms. Bernadette Wellman at ASF, a Closure Certification Report is being prepared in accordance with Ohio Administrative Code and the most recent RCRA Closure Guidance Document in addition to the EAF Closure Activity Report submitted on October 12, 1994. The document will be submitted in January 1995.

D. SEBRING FACILITY -Closure and Post Closure Requirements:

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Admin. Code # 3745-66-12(D)(4).

In a June 01, 1994 letter to Mr. Donald R. Schregardus, Director Ohio EPA, American Steel Foundries requested a meeting with the agency to discuss beneficial reuse of foundry wastes and possible modifications to the landfill cap design.

On July 25, 1994 a meeting was held between Ohio EPA and American Steel Foundries at the Ohio EPA Northeast District Office in Twinsburg, Ohio to discuss Sebring Landfill Closure Plan issues and waste reduction. As a direct result of that meeting the cap outlined in the closure plan document is being redesigned and a modified closure plan is being prepared.

In an August 05, 1994 letter to Mr. Donald R. Schregardus, Director Ohio EPA, American Steel Foundries withdrew the Landfill Closure Plan dated January 1993 and stated that a revised plan would be submitted no later than December 15, 1994. The revised plan will include issues critical to the Ohio EPA and American Steel Foundries as outlined in the August 05, 1994 letter and discussed in the July 25, 1994 meeting.

In an October 04, 1994 letter to Mr. John Palmer, Ohio EPA, Ms. Bernadette Wellman from American Steel Foundries submitted a list of questions for Ohio EPA review relative to the redesigned landfill cap. Response and/or clarification was requested so that American Steel Foundries could finalize the new Sebring Landfill Closure plan.

Mr. John Palmer, Ohio EPA responded to Ms. Wellman's October 04, 1994 clarification requests with his letters dated October 24, 1994, November 01, 1994 and November 09, 1994.

On November 11, 1994, Mr. John Worries, American Steel Foundries submitted a progress report to Mr. Ed Kitchen, Environmental Manager, Ohio EPA. Topics of discussion included a projected submittal date of December 15, 1994 for the new Sebring Landfill Closure Plan.

In a December 09, 1994 letter, Mr. John Oesch, Plant Manager, American Steel Foundries formally submitted the new Sebring Landfill Closure Plan.

Mr. Edward J. Brosius, Assistant General Counsel & Assistant Secretary, Amsted Industries Inc. demonstrated Financial Assurance to the EPA in letter dated December 20, 1994.

Mr. John Oesch, Plant Manager, American Steel Foundries formally submitted the new Sebring Landfill Closure Plan Closure Cost Estimate in a December 16, 1994 letter.

On December 19, 1994, Mr. John Oesch, Plant Manager, American Steel Foundries formally submitted the Surcharge and Settlement Monitoring Plan for the new Sebring Landfill.

In a "NOTIFICATION OF ERROR" letter dated December 21, 1994, Mr. T. C. Bradway, Environmental Manager, American Steel Foundries informed the Ohio EPA and the U. S. EPA that the possibility existed that the wrong cover letter had been sent with the Surcharge and Settlement Monitoring Plan for the new Sebring Landfill.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.

4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.

5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.

6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

In a June 28, 1994 letter to Mr. Terry Bradway of American Steel Foundries, Mr. John Palmer from Ohio EPA listed his notice of deficiencies for the February 23, 1994 Groundwater Sampling Report of the December 14 through 17, 1993 sampling of the groundwater monitoring wells at the Sebring Landfill.

In a July 22, 1994 letter subtitled "Groundwater Sampling Report Response to Comments" American Steel Foundries responded to Mr. John Palmer's June 28, 1994 notice of deficiencies letter.

Ms. Bernadette Wellman Manager of Environmental Affairs, American Steel Foundries received a response to the July 22, 1994 letter subtitled "Groundwater Sampling Report Response to Comments" covering the notice of deficiency to the February 23, 1994 Groundwater sampling event by Mr. John Palmer from the Ohio EPA in a November 23, 1994 letter.

In a July 15, 1994 letter from Mr. John Palmer of the Ohio EPA to Mr. Terry Bradway at American Steel Foundries, John listed a notice of deficiencies for the Supplementary Annual Report for the 1993 Ground Water Monitoring of the Sebring Landfill.

In a July 22, 1994 letter subtitled "Response to Groundwater Comments", American Steel Foundries addressed Mr. Palmer's notice of Deficiencies from the July 15, 1994 letter.

Ms. Bernadette Wellman Manager of Environmental Affairs, American Steel Foundries received a response to the July 22, 1994 letter subtitled " Response to Groundwater Comments" for the notice of deficiency to the "1993 Supplementary Annual Report" by Mr. John Palmer from the Ohio EPA in a November 23, 1994 letter.

In a December 05, 1994 Letter subtitled "Sampling Report No. 4" from Mr. John Oesch, Plant Manager, American Steel Foundries submitted the sampling report for the September 14 and 15, 1994 sampling of the groundwater monitoring wells at the Sebring Landfill.

In a December 19, 1994 letter titled "Groundwater Sampling Report Response to Comments", Mr. John F. Oesch, Plant Manager, American Steel Foundries responded to Mr. John Palmer's November 23, 1994 letter covering the "1993 Supplementary Annual Report" notice of deficiencies.

In a December 21, 1994 letter titled "Groundwater Sampling Report Response to Comments", Mr. John F. Oesch, Plant Manager, American Steel Foundries responded to Mr. John Palmer's November 23, 1994 letter covering the June 28, 1994 notice of deficiencies from Mr. John Palmer, Ohio EPA.

A copy of the Groundwater Quality Assessment for the Sebring Facility was included as an appendix of the New Landfill Closure Plan that was submitted by Mr. John F. Oesch's letter of December 09, 1994. Currently the document is being revised to reflect changes requested in both of Mr. John Palmer's letters of November 23, 1994. The revised document was submitted in a January 06, 1995 letter by Mr. John F. Oesch, Plant Manager, American Steel Foundries.

The next sampling event is tentatively scheduled for the week of March 13, 1995.

TEST RESULTS AND SAMPLING SUMMARY

Our experiments to reduce lead and cadmium in Electric Arc Furnace dust have concluded. Although American Steel Foundries has been successful in reducing the levels of toxicity in the dust, we have not been successful in keeping them consistently below TCLP regulatory action levels for hazardous materials. However, we plan to monitor each load of dust with the EPA Toxic Characteristic Leaching Procedure (TCLP) test for metals for an indefinite period.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

In December 1994 the following waste streams were sampled:

1. Spent Foundry Sand
2. Floor Sweepings
3. Refractory Brick
4. Broken Core Butts

Test results from that sampling have not been received to date but will be included in the next quarterly report.

A waste stream profile was established for material from a spill of Terrapaint Core Wash. Please see attachment "B".

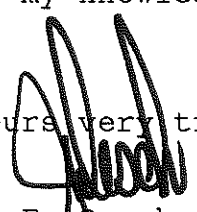
ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,


J. F. Gesch
PLANT MANAGER

TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: BMW/RSW
JW
RML
RBR

Ohio EPA Z 055 522 225
Chief, Division of Solid and Hazardous Waste
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43268-0149

Ohio EPA Z 055 522 226
Division of Solid and Hazardous Waste
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Ohio EPA Z 055 522 227
Supervisor, division of Solid and Infectious Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.
Amsted Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

P. C. Schillawski Z 055 522 228
Squire Sanders & Dempsey
4900 Society Center
127 Public Square
Cleveland, Ohio 44114-1304

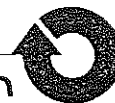
Mahoning County Health District Z 055 522 229
Chief, Solid Waste Program
2801 Market Street
Youngstown, Ohio 44507-1649
Attn: R.D.Setty

ATTACHMENT "A"

RESAMPLE SAMPLE ANALYSIS REQUEST FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 122894 A BOX NO. 116

Request Submitted by: T.C. BRADWAY

Date Submitted: 12/28/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 12/28/94 Time of Sampling: Compos: TR AM/PM
Sampler's Name: T.C. BRADWAY
Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES
Sampler's Signature: [Signature]
Witness's Name: [Signature]
Title and Affiliation of Witness:
Witness's Signature:

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION**CERTIFICATION ANALYSIS REPORT**

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 12/22/94
Envirite Waste ID#: CS1373

Sample Collection Date: 12/16/94
Date Analysis Completed: 12/20/94

Waste Description: EAF Furnace Dust BOX #: 142

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.4
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.5 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	<0.16 mg/L
TCLP Mercury	0.0042 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.010 mg/L
TCLP Silver	0.40 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/RC Coordinator

cc: File
TSR: tmc

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

RECEIVED DEC 16 1994

ENVIRITE

CORPORATION



AMERICAN STEEL FOUNDRIES

Generator Name:

Facility Address:

1001 E. BROADWAY ST.

ALLIANCE

OHIO

44601

City

State

Zip

Stream Number:

CS1373

Date Results Needed: 7 TO 10 DAYS

Waste Code:

D006, D008

Frequency: EACH BOX

Volume:

Generator's Description / Identification of Waste:

EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO.

BOX NO.

142

Request Submitted by: T. C. BRADWAY

Date Submitted: 12/16/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling:

12/16/94

Time of Sampling: COMPOSITE AM/PM

Sampler's Name:

T. C. BRADWAY

Title and Affiliation of Sampler:

ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature:

Witness's Name:

P. COOK

Title and Affiliation of Witness:

RECEIVED BY P. COOK 12-16-94

Witness's Signature:

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume: _____

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY
SAMPLE NO. BOX NO. 142

Request Submitted by: T.C. BRADWAY Date Submitted: 12/16/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 12/16/94 Time of Sampling: Composite AM/PM

Sampler's Name: T.C. BRADWAY

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature: _____

Witness's Name: JB

Title and Affiliation of Witness: RECEIVED BY P. COOK 12-16-94

Witness's Signature: _____

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION**CERTIFICATION ANALYSIS REPORT**

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 12/08/94
Envirite Waste ID#: CS1373

Sample Collection Date: 11/28/94
Date Analysis Completed: 12/06/94

Waste Description: EAF Furnace Dust BOX #: 120

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.7 S.U.
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.1 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	1.7 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QA/QC Coordinator

cc: File

TSR:

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume: _____

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 112894A BOX NO. 120

Request Submitted by: T.C. BRADWAY

Date Submitted: 11/28/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 11/28/94 Time of Sampling: Composite AM/PM
Sampler's Name: T.C. BRADWAY

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature: T.C. Bradway

Witness's Name: REC'D 11-28-94

Title and Affiliation of Witness: J. Burky

Witness's Signature: John A. McDaniel

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 11/18/94
Envirite Waste ID#: CS1373

Sample Collection Date: 11/09/94
Date Analysis Completed: 11/17/94

Waste Description: EAF Furnace Dust BOX #: 149

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.76
Total CN (As Received)	1.1 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	0.64 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	2.1 mg/L
TCLP Mercury	0.0037 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.014 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QA/QC Coordinator

cc: File

TSR: tmc

FAX 11-18-94	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume: _____

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY
SAMPLE NO. 110994A BOX NO. 149

Request Submitted by: T.C. BRADWAY Date Submitted: 11/9/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 11/9/94 Time of Sampling: Composite AM/PM
Sampler's Name: T.C. BRADWAY
Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES
Sampler's Signature: T.C. Bradway
Witness's Name: _____
Title and Affiliation of Witness: REC'D 11-9-94
Witness's Signature: J. Burk

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.



ENVIRITE CORPORATION**CERTIFICATION ANALYSIS REPORT**

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 11/01/94
Envirite Waste ID#: CS1373

Sample Collection Date: 10/20/94
Date Analysis Completed: 10/26/94

Waste Description: EAF Furnace Dust

BOX #: 150

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.67
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.8 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	3.2 mg/L
TCLP Mercury	0.0068 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QA/QC Coordinator

cc: File
TSR: tmc

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216 456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume: _____

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY
SAMPLE NO. 102094 A BOX NO. 150

Request Submitted by: T.C. BRADWAY

Date Submitted: 10/20/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 10/20/94 Time of Sampling: Composite AM/PM
Sampler's Name: T.C. BRADWAY
Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES
Sampler's Signature: T.C. Bradway
Witness's Name: _____
Title and Affiliation of Witness: REC'D 10/19/94 X-Robert Miller
Witness's Signature: JB

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 10/18/94
Envirite Waste ID#: CS1373

Sample Collection Date: 10/04/94
Date Analysis Completed: 10/11/94

Waste Description: EAF Furnace Dust

BOX #: 10/4/94

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.35 S.U.
Total CN (As Received)	1.6 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	3.9 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	26.0 mg/L
TCLP Mercury	0.0037 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.031 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/QC Coordinator

cc: File
TSR: tmc

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-621-4568		FAX#: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY
SAMPLE NO. 100494A BOX NO. 101

Request Submitted by: T. C. BRADWAY Date Submitted: 10/4/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 10/4/94 Time of Sampling: Composite AM/PM
Sampler's Name: T. C. BRADWAY
Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES
Sampler's Signature: [Signature]
Witness's Name: [Signature]
Title and Affiliation of Witness: REC'D 10-4-94
Witness's Signature: [Signature]

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
 1001 E. Broadway Street
 Alliance, Ohio 44601

Report Date: 09/22/94
 Envirite Waste ID#: CS1373

Sample Collection Date: 09/15/94
 Date Analysis Completed: 09/20/94

Waste Description: EAF Furnace Dust BOX #: 110

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.25 S.U.
Total CN (As Received)	0.56 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.8 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	31.0 mg/L
TCLP Mercury	0.0058 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.013 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

C Cheryl Hawkins
 QA/QC Coordinator

cc: File
 TSR: lmc

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801



Corporate Waste
Approval Group
Serving Public Industries

WASTE APPROVAL FORM

Date : 10/18/94
BFI Location : Willow Creek Landfill
BFI Initiator : CASANTA, A
Generator : AMERICAN STEEL FOUNDRIES
Generator Location : Alliance, OH
WCD Number : A836062
BFI Number : 225032

WASTE DESCRIPTION: Sand
Soil
Specific Products, Flowcoat

Approved
JKE
10-19-94

SAFETY PRECAUTIONS: Avoid Skin and Eye Contact.

RECOMMENDED MANAGEMENT: Direct Burial

Facility... Glen Willow Landfill
Northern Ohio Landfills
Willow Creek Landfill
Mahoning Landfills

COMMENTS:

Approved for one-time only disposal.

The following items were received by the Corporate Waste Approval Group:

- Analytical data from DeYor MetPath Laboratories
- Chain of Custody
- Material Safety Data Sheets

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt of the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above.

This waste stream has been assigned BFI Waste Code: OH/217:218:219:B55/951018/225032

Corporate Waste Approval Group

Diana L. Lasoo

Technical Representative



BROWNING-FERRIS INDUSTRIES

WCD No. AB 39062

OH 217, 218, 219, 951018 225032
BFI WASTE CODE 855,

WASTE APPROVAL REQUEST

BFI to complete this area.

BFI Initiator: Al Casanta
Location: Willowcreek / Moss
Company Number: 219 / 611
Telephone: (216) 947-2548
Fax: (216) 947-2724
Date: 9-2-94

Action Requested: ☒ New Waste Approval
☐ Up-Date Approval - Previous Number: _____
Disposal Site Requested: 217-218-219 855
Company Number: " " " "
Management Method Requested: ☒ Landfill ☒ Hauling
☐ Other _____

WASTE CHARACTERIZATION DATA SPECIAL WASTE

IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED.

1. GENERATOR INFORMATION

a) Generator's Name: AMERICAN STEEL FOUNDRIES
b) Generating Facility's Address: 1001 E. BRADWAY
City: ALLIANCE State: OH Zip: 44601
c) Generator's Representative: TERRY C. BRADWAY
Title: ENVIRONMENTAL MANAGER
Telephone: (216) 823-6150 Ext. 206
Fax: (216) 821-4568
d) Emergency/Information Contact: SAME AS ABOVE
Title: _____
Telephone: () _____

e) State/Provincial/Local Registration No.: _____
Generator's EPA Id. No.: OH0981090418
Industry Description/SIC Code: 3325
f) Customer's Name: _____
g) Customer's Mailing Address: _____
City: _____ State: _____ Zip: _____
h) Representative: _____
Telephone: () _____
Fax: () _____

2. GENERAL WASTE STREAM INFORMATION

a) Name/Description of The Waste: Flow Coat 22A, TERRA PAINT #578, SOIL, PREVIOUS APPROVED FORM SAND
b) Process Generating Waste: CLEAN UP SPILL AT STORAGE DUCK IN NORTH END OF NEW BUILDING
c) Is this a treatment residue of a waste which was previously a restricted hazardous waste? ☐ Yes ☒ No
If yes, describe the waste and the process generating the waste prior to treatment: _____
d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Regulations? ☐ Yes ☒ No
If yes, enter the Waste Identification Number if one has been assigned: _____
e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State, Provincial, or local Regulations?
☒ Yes ☐ No If yes, enter Waste Identification Number: N/A
f) Recommended personal protection equipment and special handling procedures: NONE
g) Anticipated Volume: 10 to 15 cys. ☒ Cubic Yards ☐ Tons ☐ Gallons ☐ Cubic Meters ☐ Tonnes(metric)
Other _____ Per: ☐ Year ☐ Month ☐ Week ☐ Day ☒ One Time ☐ Other _____
To be transported in: ☒ Bulk ☐ Drums (type/size) _____ ☐ Other _____
h) Is a representative sample included? ☒ Yes ☐ No NO SAMPLE TAKEN

3. WASTE PROPERTIES AT 72°F

a) Physical State:
☒ Solid ☐ Semi-solid
☐ Powder ☐ Liquid
☐ Combination
b) Layers:
☒ Single-layered ☐ Bi-layered ☐ Multi-layered
c) Color(s): WHITE, TAN, BLUE, BLACK & BROWN
Describe _____
d) Odor: PAINT
Describe _____
☐ None ☒ Mild ☐ Strong

e) Density Range: _____ to _____
☒ N/D ☐ lbs/gal. ☐ g./cc.
☐ lbs./yd.³ ☐ Kg/m³ ☐ Other _____
f) Flash Point, °F:
☐ ≤ 72 ☐ 73-100 ☐ 101-140
☐ 141-200 ☐ ≥ 201 ☐ N/A ☒ N/D
g) pH:
☐ ≤ 2 ☐ 2.1 - 5.0 ☐ 5.1 - 9.0
☐ 9.1 - 12.4 ☐ ≥ 12.5 ☐ N/A ☒ N/D

BFI WASTE CODE

4. REACTIVITY	5. THIS WASTE CONTAINS	6. SPECIAL WASTE COMPOSITION																														
<p>Note if the waste exhibits any of the following reactive properties:</p> <p> <input type="checkbox"/> Water Reactive <input type="checkbox"/> Acid Reactive <input type="checkbox"/> Alkaline Reactive <input type="checkbox"/> Oxidizer <input type="checkbox"/> Autopolymerizable <input type="checkbox"/> Pyrophoric <input type="checkbox"/> Explosive <input type="checkbox"/> Thermally Sensitive <input type="checkbox"/> Shock Sensitive <input checked="" type="checkbox"/> None of the above </p>	<p>Note if the waste contains any of the following: If any are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6.</p> <table style="width:100%;"> <tr> <td><input type="checkbox"/> Free Liquids</td> <td><input type="checkbox"/> OSHA Substances</td> </tr> <tr> <td><input type="checkbox"/> Free Cyanide</td> <td><input type="checkbox"/> Etiological Agents</td> </tr> <tr> <td><input type="checkbox"/> Free Sulfide</td> <td><input type="checkbox"/> Pathogens</td> </tr> <tr> <td><input type="checkbox"/> Free Ammonia</td> <td><input type="checkbox"/> Biological Materials</td> </tr> <tr> <td><input type="checkbox"/> Dioxins</td> <td><input type="checkbox"/> Radioactive Materials</td> </tr> <tr> <td><input type="checkbox"/> Organic Solvents</td> <td><input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761</td> </tr> <tr> <td><input type="checkbox"/> Virgin Oils</td> <td><input checked="" type="checkbox"/> None of the Above</td> </tr> <tr> <td><input type="checkbox"/> Used Oils</td> <td></td> </tr> </table>	<input type="checkbox"/> Free Liquids	<input type="checkbox"/> OSHA Substances	<input type="checkbox"/> Free Cyanide	<input type="checkbox"/> Etiological Agents	<input type="checkbox"/> Free Sulfide	<input type="checkbox"/> Pathogens	<input type="checkbox"/> Free Ammonia	<input type="checkbox"/> Biological Materials	<input type="checkbox"/> Dioxins	<input type="checkbox"/> Radioactive Materials	<input type="checkbox"/> Organic Solvents	<input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761	<input type="checkbox"/> Virgin Oils	<input checked="" type="checkbox"/> None of the Above	<input type="checkbox"/> Used Oils		<p>Concentration ranges are suggested and units must be identified in percentages (%) and/or parts per million (ppm). Attach additional pages if necessary.</p> <table style="width:100%;"> <thead> <tr> <th style="text-align: left;">Components</th> <th style="text-align: left;">Range Min. / Max.</th> </tr> </thead> <tbody> <tr> <td><u>TERRA PAINT</u></td> <td><u>1%</u></td> </tr> <tr> <td><u>Flow Coat</u></td> <td><u>19%</u></td> </tr> <tr> <td><u>SOIL</u></td> <td><u>40%</u></td> </tr> <tr> <td><u>SAND</u></td> <td><u>40%</u></td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Components	Range Min. / Max.	<u>TERRA PAINT</u>	<u>1%</u>	<u>Flow Coat</u>	<u>19%</u>	<u>SOIL</u>	<u>40%</u>	<u>SAND</u>	<u>40%</u>				
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7. TRANSPORTATION INFORMATION																																
<p>If the waste is a DOT Hazardous Material, complete the following:</p> <p>Proper USDOT Shipping Name: <u>NA</u></p> <p>USDOT Hazard Class: _____ UN or NA Number: _____ CERCLA Reportable Quantity: _____</p>																																
8. SUPPLEMENTAL INFORMATION																																
<p> <input type="checkbox"/> None <input checked="" type="checkbox"/> MSD Sheets <input checked="" type="checkbox"/> Analytical Data <input type="checkbox"/> Chain of Custody <input type="checkbox"/> Memo/Letter <input type="checkbox"/> Waste Composition <input type="checkbox"/> Other - describe: _____ No. of Pages: _____ </p>																																
9. GENERATOR'S CERTIFICATION																																
<p>I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omissions of composition or properties exist, that all known or suspected hazards have been disclosed, and that the waste is not a regulated hazardous waste by the USEPA, by an applicable State or Provincial authority, or by any applicable local authority, and does not contain PCBs regulated by TSCA (i.e., 40 CFR 761) or any Provincial authority.</p> <p>GENERATOR'S AUTHORIZED SIGNATORY as identified in Section 1 (c):</p> <p> <u>9/24/94</u> <u>T.C. Beaudry</u> <u>T.C. Beaudry</u> <u>Environmental Manager</u> DATE PRINT NAME SIGNATURE TITLE </p>																																
REPRESENTATIVE SAMPLE CERTIFICATION																																
<p>This Section is to be completed by the person obtaining the sample of the above described waste.</p> <p>I certify that the sample for which analytical data was provided on the waste described above is representative of that waste and was collected and preserved in a manner consistent with accepted technical standards.</p> <p>Lab sample assigned to: <u>DEYOR LABS</u> (peel off label)</p> <p>Collector's Name: <u>T.C. Beaudry</u></p> <p>Signature: <u>T.C. Beaudry</u></p> <p>Company: <u>AMERICAN STEEL FOUNDRIES</u></p> <p>Title: <u>ENV. MGR.</u></p> <p>Telephone Number: <u>(216) 823-6150</u></p> <p>Date Collected: <u>8/24/94</u></p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>Generator's Name: _____</p> <p>Waste Description: _____</p> <p>Date Collected: <u>8/24/94</u></p> <p>WCD No. AB <u>39062</u></p> </div>																																

CLIENT SAMPLE IDENTIFICATION

SOIL, SAND W/ FLO-KOTE 22A

94818450

LAB ID NO.

94 818450

.0

DATE SAMPLED

08/23/94

TIME

11:00

RECEIVED

08/26/94
REPORTED

AMERICAN STEEL FOUNDRIES

8450

00000

09/13/94

TCLP EXTRACTION PROC
ZERO HEADSPACE EXTRT

FINAL PH=5.01
SAMPLE DESTROYED IN LABORATORY ACCIDENT
UNABLE TO PERFORM VOLATILE ANALYSIS.
CLIENT NOTIFIED; SAMPLE TO BE RECOLLECTED.

TCLP METALS & BIAS %

RESULT	REFERENCE LIMIT	UNITS
ARSENIC	<0.5	0.0 5.0 MG/L
Spike recovery	100	%
BARIUM	0.82	0.0 100.0 MG/L
Spike recovery	96	%
CADMIUM	<0.03	0.0 1.0 MG/L
Spike recovery	93	%
CHROMIUM	<0.3	0.0 5.0 MG/L
Spike recovery	102	%
SELENIUM	<0.25	0.0 1.0 MG/L
Spike recovery	105	%
MERCURY	<0.01	0.0 0.2 MG/L
Spike recovery	102	%
LEAD	<0.2	0.0 5.0 MG/L
Spike recovery	99	%
SILVER	<0.2	0.0 5.0 MG/L
Spike recovery	94	%
TCLP SUPPL. METALS		
NICKEL	<0.2	MG/L
Spike recovery	94	%
COPPER	<0.1	MG/L
Spike recovery	90	%
TCLP BNA'S & BIAS %		
METHOD NUMBER	8270	
CRESOLS	<0.1	0.0 200 MG/L
Spike recovery	23	%
2,4-DINITROTOLUENE	<0.1	0.0 0.13 MG/L
Spike recovery	32	%
HEXACHLOROBENZENE	<0.1	0.0 0.13 MG/L
Spike recovery	43	%
HEXACHLOROBUTADIENE	<0.1	0.0 0.50 MG/L
Spike recovery	31	%
HEXACHLOROETHANE	<0.1	0.0 3.0 MG/L
Spike recovery	23	%

--- DIRECTORS ---

--- PATHOLOGISTS ---

Patrick K. Jaynes Ph.D. John C. York II, M.D.

Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D. BFI WASTE SYSTEMS

WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225

ATWATER

OH 44201



7655 Market Street, Suite 2500
Youngstown, Ohio 44512
(216) 758-5788
(800) 365-3396

Reference limit is provided for convenience. It may not apply to every hazard assessment. Be certain correct limit is applied to evaluation.

CLIENT SAMPLE IDENTIFICATION

SDIL SAND W/ FLO-KOTE 22A

.0

AMERICAN STEEL FOUNDRIES

94818450

DATE SAMPLED

08/23/94

TIME

11:00

LAB ID NO.

94 818450

RECEIVED

 08/26/94
REPORTED

09/13/94

2450

00000

RESULT
REFERENCE LIMIT
UNITS

NITROBENZENE
 Spike recovery
 PENTACHLOROPHENOL
 Spike recovery
 PYRIDINE
 Spike recovery
 2,4,5-TRICHLOROPHEN
 Spike recovery
 2,4,6-TRICHLOROPHEN
 Spike recovery
 REACTIVITY SCREEN

<0.1

43

<0.1

20

<0.1

42

<0.1

24

<0.1

21

0.0

2.0

0.0

100.

0.0

5.0

0.0

400.

0.0

2.0

MG/L

%

MG/L

%

MG/L

%

MG/L

%

MG/L

%

REACTIVE CYANIDE <2.0 PPM
 REACTIVE SULFIDE <2.0 PPM
 ASTM D5049 METHOD D/D4978 METHOD B

CORROSIVITY SCREEN

SAMPLE IS NONCORROSIVE, PH = 9.37
 ASTM D4980 METHOD B/USEPA 9040

IGNITABILITY TEST

SAMPLE HEATED TO 160F WITHOUT FLASH OR IGNITION.
 ASTM D4982 METHOD B/ASTM D93

TCLP REVIEW

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846
 AS REVISED NOVEMBER 24, 1992 (57FR55114)
 REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR

--- DIRECTORS ---

--- PATHOLOGISTS ---

Patrick K. Jaynes Ph.D. John C. York II, M.D.

Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D. BFI WASTE SYSTEMS

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 limit is applied to evaluation.

CLIENT SAMPLE IDENTIFICATION

RESAMPLE

94838327

LAB ID NO.

94 838327

DATE SAMPLED

09/30/94

TIME

03:15

RECEIVED

10/04/94
REPORTED

AMERICAN STEEL FOUNDRIES

8327

00000

10/13/94

ZERO HEADSPACE EXTRT

TCLP VOA'S & BIAS %

METHOD NUMBER

VINYL CHLORIDE

Spike recovery

1,1-DICHLOROETHYLENE

Spike recovery

METHYL ETHYL KETONE

Spike recovery

CHLOROFORM

Spike recovery

CARBON TETRACHLORIDE

Spike recovery

BENZENE

Spike recovery

1,2-DICHLOROETHANE

Spike recovery

TRICHLOROETHYLENE

Spike recovery

TETRACHLOROETHYLENE

Spike recovery

CHLOROBENZENE

Spike recovery

1,4-DICHLOROBENZENE

Spike recovery

TCLP REVIEW

COMPLETED 10/05/94

SAMPLE DISPLAYED EXCESSIVE DISSOLVED GASES

8240

<0.002

0.0

0.2

MG/L

%

<0.002

0.0

0.7

MG/L

%

<1.0

0.0

200

MG/L

%

<0.002

0.0

6.0

MG/L

%

<0.002

0.0

0.5

MG/L

%

<0.002

0.0

0.5

MG/L

%

<0.002

0.0

0.5

MG/L

%

<0.002

0.0

0.5

MG/L

%

<0.002

0.0

0.7

MG/L

%

<0.002

0.0

100.0

MG/L

%

<0.002

0.0

7.5

MG/L

%

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846

AS REVISED NOVEMBER 24, 1992 (57FR55114)

REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR

Albert F. Vicinie III

--- DIRECTORS ---

Patrick K. Jaynes Ph.D.

Anthony Nasrallah Ph.D.



DEYOR METPATH

Laboratories

a CORNING Company

7655 Market Street, Suite 2500

Youngstown, Ohio 44512

(216) 758-5788

(800) 365-3396

BFI WASTE SYSTEMS

WILLOWCREEK LANDFILL DISTRICT

1043 STATE ROUTE 225

ATWATER

OH

44201

Reference limit is provided for convenience. It may not apply to every hazard assessment. Be certain correct limit is applied to evaluation.



(800) 365-3396
(216) 758-5788

DeYor Laboratories Inc.
Southwoods Medical-Health Complex

7655 Market Street • Suite 2500 • P.O. Box 3349 • Youngstown, Ohio 44513

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY

BROWNING-FERRIS INDUSTRIES

Location: Willowcreek Client# U23

Billing Control # (Lab use only) 94-274467

Purchase Order# 219-8205

Generator/Project# American Steel Foundries

LAB ID# 818450 WCD # _____

Waste Description: Soil - Sand with Flo-Kote 22A

Number of containers _____

Matrix ☒ Soil ☐ Solid ☐ Multiphase ☐ Organic/oil

ANALYSES REQUESTED

RUSH Y N

- 553 ☒ TCLP Extraction
546 ☒ Zero Headspace Extraction
548 ☒ Metals + spike recoveries
544 ☒ Supplemental metals + spikes (Copper & Nickel)
585 ☐ UST Priority Panel (Metals + TPH + Rush Service)
578 ☒ Volatiles + spike recoveries
582 ☒ Semi-volatiles + spike recoveries
581 ☐ Pesticides/Herbicides + spike recoveries
1002 ☒ Reactivity Screen
1003 ☒ Corrosivity Screen
859 ☒ Ignitability
511 ☐ Total Petroleum Hydrocarbons (TPH)
569 ☐ BETX
502 ☐ PCB (soil)

Other _____
245 ☒ Signatory Review

Approved Cost -
\$1000.00
P# A-28057
Cust PO

Sample Taken By:	Date	Time	Company
<u>T.C. Brandy</u>	<u>8/23/94</u>	<u>11:00 AM</u>	<u>American Steel Foundries</u>
Sample Submitted By:			
<u>A/CASMITA</u>	<u>8-26-94</u>		<u>BZF-Willowcreek</u>
Sample Couriers By:			
<u>Matt Genova</u>	<u>8-26-94</u>	<u>3-30</u>	<u>DeYor</u>
Sample Received By:			
<u>Dennis Brandy</u>	<u>8/26/94</u>	<u>10:22</u>	<u>DeYor Laboratories</u>

7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY**BROWNING-FERRIS INDUSTRIES**Location: Willow Creek Client# 623Billing Control # (Lab use only) 94-224877Purchase Order# 219-8259Generator/Project# American Steel FoundriesLAB ID# 838327 WCD # _____

Waste De _____

Number of containers _____

Matrix Soil ☒ Solid ☐ Multiphase ☐ Organic/oil**ANALYSES REQUESTED**

RUSH Y N

- 553 _____ TCLP Extraction
546 ☒ Zero Headspace Extraction
548 _____ Metals + spike recoveries
544 _____ Supplemental metals + spikes (Copper & Nickel)
585 _____ UST Priority Panel (Metals + TPH + Rush Service)
578 ☒ Volatiles + spike recoveries
582 _____ Semi-volatiles + spike recoveries
581 _____ Pesticides/Herbicides + spike recoveries
1002 _____ Reactivity Screen
1003 _____ Corrosivity Screen
859 _____ Ignitability
511 _____ Total Petroleum Hydrocarbons (TPH)
569 _____ BETX
502 _____ PCB (soil)
_____ Other _____
245 ☒ Signatory Review

Page.
This is a resample
for a screw up at
The lab. Check with
Rust/1 Wk

Sample Taken By:	Date	Time	Company
<u>X TIC Brandy</u>	<u>9/30/84</u>	<u>3:15</u>	<u>ASF</u>
Sample Submitted By:			
Sample Couriers By:			
<u>Daniel T. Black</u>			
Sample Received By:			
<u>Joni Verbska</u>	<u>10-4-84</u>		<u>DeYor Laboratories</u>

FOSECO INC.

MATERIAL SAFETY DATA SHEET (29 CFR PART 1910.1200 -HAZARD COMMUNICATION)

SECTION 1 - IDENTIFICATION

MATERIAL/PRODUCT: TERRAPAIN 578
MANUFACTURER/DISTRIBUTOR: Foseco, Inc.
ADDRESS: 20200 Sheldon Road
Brook Park, Ohio 44142

MSDS REV. NO.: 2
DATE PREPARED: April 25, 1991
PREPARER: Trevor Hardy
DURING NORMAL BUSINESS HOURS
TELEPHONE: (216) 826-4548
OUTSIDE NORMAL BUSINESS HOURS
TELEPHONE: CHEMTREC 1-800-424-9300

30-111

SECTION 2 - HAZARDOUS COMPONENTS

HAZARDOUS COMPONENT	CAS NO.	%	OSHA PEL (mg/M3)	ACGIH TLV (mg/M3)	OTHER LIMITS
Water	7732-18-5	<25	N/A	N/A	N/A
Zircon	14940-68-2	>75	5 as Zr	5 as Zr	N/A
Acrylic Polymer	9003-01-4	<2	N/A	N/A	N/A

SECTION 3 - PHYSICAL/CHEMICAL CHARACTERISTICS

BOILING PT: 212 F
VAPOR PRESSURE: N/A
VAPOR DENSITY: N/A
APPEARANCE AND ODOR: Blue liquid. Slight odor.
SPECIFIC GRAVITY: 2.5
EVAPORATION RATE: N/A
SOLUBILITY IN WATER: Contains water

SECTION 4 - FIRE AND EXPLOSION DATA

FLASH POINT: None
EXTINGUISHING MEDIA: Will not burn.
SPECIAL FIREFIGHTING PROCEDURES: N/A
FLAMMABLE LIMITS: Lel: N/A Uel: N/A

UNUSUAL FIRE & EXPLOSION HAZARDS: Sealed drums may generate high pressure internally when exposed to heat or flame.

SECTION 5 - REACTIVITY DATA

STABILITY: Stable
INCOMPATIBILITY: None
HAZARDOUS POLYMERIZATION: Will not occur.
HAZARDOUS DECOMPOSITION PRODUCTS: Oxides of carbon.

N/A = Not Applicable
N/K = Not Known

SECTION 6 - HEALTH HAZARD DATA

ROUTE(S) OF ENTRY: INHALATION (YES) SKIN (NO) EYES (YES) INGESTION (NO)
HEALTH HAZARDS: ACUTE Mists or dusts from dried product may cause irritation of mucous membranes and eyes. Liquid may cause slight skin and eye irritation
HEALTH HAZARDS: CHRONIC None known.

TOXICITY DATA: N/A
CARCINOGENICITY: NTP/IARC/OSHA/OTHER: N/A

SIGNS AND SYMPTOMS OF EXPOSURE: Irritation of mucous membranes and respiratory system.
MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: Pre-existing respiratory ailments.

EMERGENCY AND FIRST AID PROCEDURES:
INHALATION: Remove person to fresh air.
SKIN: Wash with water.
EYES: Flush with water.
INGESTION: Drink plenty of water. Induce vomiting. Refer to physician.

SECTION 7 - PRECAUTIONS FOR SAFE HANDLING AND USE

SPIILLS/LEAKS: Absorb in inert material such as sand.
WASTE DISPOSAL: Dispose of in accordance with local, state and federal regulations.
HANDLING, USE AND STORAGE: Store below 150°F. Keep from freezing. Replace lid after use to reduce evaporation.

SECTION 8 - CONTROL MEASURES

RESPIRATORY PROTECTION: If PEL/TLV is exceeded use NIOSH approved mask for dusts and mists.
VENTILATION: Recommended sufficient to maintain below PEL/TLV.
GLOVES: Rubber or other impermeable. EYE PROTECTION: Safety goggles
OTHER: N/A

N/A = Not Applicable
N/K = Not Known

SIGNATURE OF PREPARER: 

Please ensure that all persons coming into contact with this product are aware of the information contained in this MSDS Sheet. Information presented herein has been compiled from sources considered to be reliable and is accurate and reliable to the best of our knowledge and belief but is not guaranteed to be so. It is the user's responsibility to determine for himself the suitability of any material for a specific use and to adopt such safety precautions as may be necessary. If you need any further information from us to make the determinations which you must make to use this material safely, please contact the above named preparer.

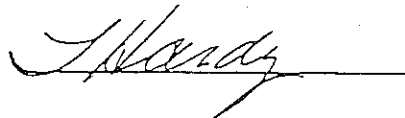
FOSECO INC.

SUPPLIER NOTIFICATION

TERRAPAIN* 578

The above listed product contains no toxic chemical or chemicals subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372, based upon our knowledge of the raw materials comprising this product.

This notification is attached to the product Material Safety Data Sheet (MSDS) and must not be detached from the MSDS. Any copying or redistribution of the MSDS shall include copying and redistribution of this notice attached to copies of the MSDS subsequently redistributed.

Signature of Preparer: 

* Registered Trademark

#112

TETRASodium Pyrophosphate

(CHECK OFF APPROPRIATE BOXES)

ROUTE OF ENTRY

☐ INHALATION
☐ SKIN ABSORPTION
☐ INGESTION
☒ SKIN OR EYE CONTACT

HEALTH HAZARDS

☐ NO HEALTH HAZARD
☐ TOXIC
☐ HIGHLY TOXIC
☐ REPRODUCTIVE TOXIN
☒ IRRITANT
☐ CORROSIVE
☐ SENSITIZER
☐ CARCINOGEN

PHYSICAL HAZARDS

☒ NO PHYSICAL HAZARDS
☐ COMBUSTIBLE LIQUID
☐ COMPRESSED GAS
☐ OXIDIZER
☐ FLAMMABLE GAS
☐ EXPLOSIVE
☐ FLAMMABLE LIQUID/SOLID
☐ PYROPHORIC
☐ ORGANIC PEROXIDE
☐ WATER REACTIVE
☐ UNSTABLE (REACTIVE)

TARGET ORGANS & EFFECTS

☐ LUNGS
☐ HEART
☐ KIDNEY
☒ EYES
☒ SKIN
☐ PROSTATE
☐ BLOOD
☐ LIVER
☐ CENTRAL NERVOUS SYSTEM
☐ CARDIOVASCULAR SYSTEM
☐ MUCOUS MEMBRANES
☐ AUTONOMIC NERVOUS SYSTEM
☐ RESPIRATORY SYSTEM
☐ BLOOD
☐ MUTAGEN
☐ TERATOGEN

☒ **HEALTH**

☐ **FLAMMABILITY**

☐ **REACTIVITY**

☐ **PROTECTIVE EQUIPMENT**



GLOVES



SAFETY GLASSES

Consult MSDS for further hazardous information and instructions.

Reorder No. 810

1986 Lab Safety Supply, Inc.

MATERIAL SAFETY DATA SHEET

May be used to comply with OSHA's Hazard Communication Standard, 29 CFR 1910.1200. Standard must be consulted for specific requirements.

N.A. = NOT APPLICABLE

N.E. = NOT ESTABLISHED

I. PRODUCT IDENTIFICATION

Product Name (s): Flo-Kote 22A

Manufacturer: Gene Conreux & Co., Inc. Telephone: (317) 241-9233
 Address: 3637 Farnsworth Avenue Hours: 8:00 a.m. - 5:00 p.m.
 Indianapolis, Indiana 46241 Fax: 317 - 248 - 7725

II. HAZARDOUS MATERIAL IDENTIFICATION SYSTEM

CATEGORY	RATING	LEGEND
Flammability	0	0= Minimal Hazard
Health	0	0= Minimal Hazard
Reactivity	0	0= Minimal Hazard
Personal Protection	B	B= Safety glasses, Gloves

III. HAZARDOUS INGREDIENTS

HAZARDOUS INGREDIENTS	CAS NO.	ACGIH THRESHOLD LIMIT VALUE	% RANGE	OSHA PERMISSIBLE EXPOSURE LIMIT
Mullite(1)	1302-93-8 12068-56-3 66402-68-4 (mixture)	10 mg/m ³ *	>50%	15 mg/m ³ *
Aluminum Oxide	1344-28-1	10mg/m ³ *	5-20%	15mg/m ³ *

* as total dust

(1) This material contains Silicon Dioxide in some form. IARC Monographs on the evaluation of the Carcinogenic Risk of Chemicals to Humans (Volume 42, 1985) concludes that there is sufficient evidence for the carcinogenicity of crystalline silica to experimental animals, and that there is limited evidence of the carcinogenicity of crystalline silica to humans. IARC Class 2A.

=====

IV. PHYSICAL/CHEMICAL PROPERTIES

=====

Appearance and Odor: White

Water Solubility: Insoluble

Melting Point(oF): 3290

Boiling Range(oF): N.A.

Specific Gravity(water=1): 2.9-3.1

Vapor Pressure(mmHg): N.A.

Percent Volatile by Weight: None

Vapor Density(Air=1): N.A.

Evaporation Rate(Butyl Acetate=1): N.A.

RQ: N.A.

TPQ: N.A.

=====

V. FIRE AND EXPLOSION INFORMATION

=====

Flash Point(C.O.C.) (oF): None

Auto-Ignition Temperature(oF): N.A.

Flammable Limits: LEL None

UEL None

Extinguishing Media: N.A.

Unusual Fire or Explosion Hazards: None

Special Fire-Fighting Procedures: A full facepiece with self contained breathing apparatus is recommended when fighting fires near this product. Water may be used to cool exposed drums.

=====

VI. CHEMICAL REACTIVITY INFORMATION

=====

Conditions Contributing to Instability: This product is stable and will not react violently with water. Hazardous polymerization will not occur.

Incompatible Materials: None

Conditions to Avoid: N.A.

Hazardous Decomposition Products: N.E.

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=====

VII. HEALTH HAZARDS A. Summary/Risks

=====

Signs and Symptoms of Overexposure: Inhalation of dust and mist may cause coughing, sneezing or other symptoms of mucous membrane irritation.

Medical Conditions Generally Aggravated by Exposure: Dust or mist may aggravate pre-existing medical conditions of the respiratory tract.

Primary Route(s) of Entry: Inhalation

Target Organ(s): lungs

Acute Health Effect: Irritation of the mucous membranes of the body.

Chronic Health Effect: Prolonged inhalation of dusts or mists may cause lung fibrosis.

Carcinogenicity: See Page 1.

Notes to Physician: The oral toxicity of this product has not been evaluated.

=====

VII. HEALTH HAZARDS & FIRST AID/EMERGENCY PROCEDURES

=====

Inhalation: If overcome, immediately remove from exposure and seek medical attention.

Skin Contact/Absorption: Wash skin thoroughly with soap and water. If irritation develops, seek medical attention.

Eye Contact: Flush with clear flowing water for at least 15 minutes. If irritation persists, seek medical attention.

Ingestion: If ingested, DO NOT induce vomiting; call a physician immediately.

=====

VIII. SPILL, LEAK AND WASTE DISPOSAL PROCEDURES

=====

Procedures for clean-up of spills/leaks: Spills may be cleaned up using a vacuum or swept up. Keep dust to a minimum. Keep product out of sewer drains & water sources. Notify federal, state, and local agencies if the need exists.

Waste Disposal: Waste generated during application, demolition breakage or spillage are not hazardous waste as defined by RCRA (40 CFR part 261). Place waste and spillage in closed containers. Dispose of in approved landfill in accordance with federal, state and local regulations.

PRINTED IN U.S.A.

Product Name: Flo-Kote 22A

Page 4

IX. PROTECTION AND CONTROL INFORMATION

Hygienic Practices: Minimize breathing vapors, mists, fumes or dusts. Avoid prolonged or repeated contact with skin. Remove contaminated clothing, laundry before reuse. Remove contaminated shoes; clean before reuse.

Ventilation Requirements: Provide ventilation sufficient to prevent exceeding recommended exposure limits.

Respiratory Protection: Use NIOSH approved respirator when conditions exceed recommended exposure limits.

Eye Protection: Use safety glasses, splash goggles or face shield when eye contact may occur.

Protective Gloves: Use chemical-resistant gloves, if needed, to avoid prolonged or repeated skin contact.

Other Clothing and Equipment: As required to prevent contact.

Engineering Controls/Work Practices: Keep containers and storage containers closed when not in use.

Special Considerations for Repair/Maintenance of Contaminated Equipment: Provide adequate respiratory, eye and skin protection.

X. PRECAUTIONS FOR SAFE HANDLING AND USE

Storage Segregation: Always segregate materials by major hazard class.

Special Handling/Storage: Do not transfer contents to unlabeled container(s)

Other: Comply with all federal, state and local regulations.

XI. DOT SHIPPING REQUIREMENTS

Shipping Name: Foundry Core Compound N.O.I

Hazard Class:None

Identification Number: None

Label (s) Required: None required

Date Prepared:10/26/87
Prepared/Revised by:Chris Froderman

Date Revised: 10/17/88
Title: Chemist

As of the date of preparation of this document, the forgoing information is believed to be accurate and is provided in good faith to comply with applicable federal and state law(s). However, no warranty or representation with respect to such information is intended or given. PRINTED IN U.S.A.

#30

FLO-KOTB 22A

(CHECK OFF APPROPRIATE BOXES)	
ROUTE OF ENTRY	
<input checked="" type="checkbox"/>	INHALATION
<input type="checkbox"/>	SKIN ABSORPTION
<input type="checkbox"/>	INGESTION
<input type="checkbox"/>	SKIN OR EYE CONTACT
HEALTH HAZARDS	
<input checked="" type="checkbox"/>	NO HEALTH HAZARD
<input type="checkbox"/>	TOXIC
<input type="checkbox"/>	HIGHLY TOXIC
<input type="checkbox"/>	REPRODUCTIVE TOXIN
<input type="checkbox"/>	IRRITANT
<input type="checkbox"/>	CORROSIVE
<input type="checkbox"/>	SENSITIZER
<input type="checkbox"/>	CARCINOGEN
PHYSICAL HAZARDS	
<input checked="" type="checkbox"/>	NO PHYSICAL HAZARDS
<input type="checkbox"/>	COMBUSTIBLE LIQUID
<input type="checkbox"/>	COMPRESSED GAS
<input type="checkbox"/>	OXIDIZER
<input type="checkbox"/>	FLAMMABLE GAS
<input type="checkbox"/>	EXPLOSIVE
<input type="checkbox"/>	FLAMMABLE LIQUID/SOLID
<input type="checkbox"/>	PYROPHORIC
<input type="checkbox"/>	ORGANIC PEROXIDE
<input type="checkbox"/>	WATER REACTIVE
<input type="checkbox"/>	UNSTABLE (REACTIVE)
TARGET ORGANS & EFFECTS	
<input type="checkbox"/>	LUNGS
<input type="checkbox"/>	HEART
<input type="checkbox"/>	KIDNEY
<input type="checkbox"/>	EYES
<input type="checkbox"/>	SKIN
<input type="checkbox"/>	PROSTATE
<input type="checkbox"/>	BLOOD
<input type="checkbox"/>	LIVER
<input type="checkbox"/>	CENTRAL NERVOUS SYSTEM
<input type="checkbox"/>	CARDIOVASCULAR SYSTEM
<input type="checkbox"/>	MUCOUS MEMBRANES
<input type="checkbox"/>	AUTONOMIC NERVOUS SYSTEM
<input type="checkbox"/>	RESPIRATORY SYSTEM
<input type="checkbox"/>	BLOOD
<input type="checkbox"/>	MUTAGEN
<input type="checkbox"/>	TERATOGEN

☒ HEALTH

☒ FLAMMABILITY

☒ REACTIVITY

☐ PROTECTIVE EQUIPMENT

Consult MSDS for further hazardous information and instructions.

Reorder No. 810

1986 Lab Safety Supply, Inc.

Willowcreek Landfill District

November 22, 1994

Mr. Terry C. Bradway
Facilities Engineer
American Steel Foundries
1001 East Broadway
Alliance, Ohio 44601

Dear Mr. Bradway,

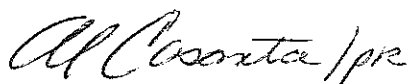
It is again time to recertify your waste streams listed below. This year we will need for each waste stream a new waste profile form and current analytical testing. TCLP Metals including Copper, Nickel and Zinc.

If you would like assistance in sampling & testing, please call me to set up an appointment.

Thank you for your cooperation and continued concern for our environment.

Waste Streams: 1. OH 855 950212 202142 006
SPENT FOUNDRY SAND
2. OH 855 950212 202143 006
FLOOR SWEEPINGS
3. OH 855 950212 202144 006
REFRACTORY
4. OH 855 950212 202145 006
BROKEN CORE BUTTS

Sincerely,



Al Casanta
Industrial Waste Specialist

AC/pr



JOHN OESCH
PLANT MANAGER

American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150

FAX NO. (216) 821-4568

October 04, 1994

**CERTIFIED LETTER
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Barbara Mazur

RECEIVED
OCT 11 1994

Z 309 033 155

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

**OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V**

Z 309 033 156

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

Progress Report # 10

This submittal is intended to meet the progress report requirements of Section X of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report.

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

5. After implementation of the Alliance Closure Plan, only in the event that clean closure cannot be achieved, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Alliance Post Closure Plan in accordance with the requirements of 40 C.F.R. # 265.117 through 265.120 and Ohio Admin. Code # 3745-66-17 through 20. If Ohio EPA does not approve the Alliance Post Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or Modified Alliance Post-Closure Plan, in accordance with 40 C.F.R. # 265.118 (d) (4) and (f) and Ohio Admin.. Code # 3745-66-18 (D) (4) and (F). Immediately upon receipt of final approval or modification of the Alliance Post-Closure Plan by Ohio EPA, Defendant shall implement such Plan.

In a June 10, 1994 letter Mr. J. F. Oesch, Plant Manager, American Steel Foundries, submitted the Background Sampling Analysis Report for the Electric Arc Furnace Baghouse Hazardous Waste Management Unit in accordance with Mr. John Palmer's Ohio EPA letter of May 09, 1994.

In a June 15, 1994 letter to Mr. Terry Bradway of American Steel Foundries, John Palmer acknowledged Ohio EPA receipt of the Background Sampling Analysis Report.

Closure of the Electric Arc Furnace Baghouse Waste Management Unit was undertaken during our plant vacation shutdown in the first two weeks of August 1994. Excavation was performed to the base of the foundations in the entire unit in order to attempt clean closure. A concrete slab was poured over the back filled excavation during the third week of August and a documentation of closure is being prepared for submittal in early October. It will include a risk assessment for the contaminated material of concern remaining in the unit.

D. SEBRING FACILITY -Closure and Post Closure Requirements:

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Admin. Code # 3745-66-12(D)(4).

In a June 01, 1994 letter to Mr. Donald R. Schregardus, Director Ohio EPA, American Steel Foundries requested a meeting with the agency to discuss beneficial reuse of foundry wastes and possible modifications to the landfill cap design.

On July 25, 1994 a meeting was held between Ohio EPA and American Steel Foundries at the Ohio EPA Northeast District Office in Twinsburg, Ohio to discuss Sebring Landfill Closure Plan issues and waste reduction. As a direct result of that meeting the cap outlined in the closure plan document is being redesigned and a modified closure plan is being prepared.

In an August 05, 1994 letter to Mr. Donald R. Schregardus, Director Ohio EPA, American Steel Foundries withdrew the Landfill Closure Plan dated January 1993 and stated that a revised plan would be submitted no later than December 15, 1994. The revised plan will include issues critical to the Ohio EPA and American Steel Foundries as outlined in the August 05, 1994 letter and discussed in the July 25, 1994 meeting.

On September 13, 1994 four members of the Ohio EPA were invited guests at a Waste Reduction Committee Meeting held at the Alliance Plant of American Steel Foundries and were thoroughly briefed on the waste reduction activities at that plant. After the meeting, the guests toured the facility. Mr. John Palmer met with Mr. R. M. Locke and Ms. B. M. Wellman following the meeting to discuss various closure activities.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.

4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.

5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.

6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA

and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

In a June 28, 1994 letter to Mr. Terry Bradway of American Steel Foundries, Mr. John Palmer from Ohio EPA listed his notice of deficiencies for the February 23, 1994 Groundwater Sampling Report of the December 14 through 17, 1993 sampling of the groundwater monitoring wells at the Sebring Landfill.

In a July 22, 1994 letter subtitled "Groundwater Sampling Report Response to Comments" American Steel Foundries responded to Mr. John Palmer's June 28, 1994 notice of deficiencies letter.

In a July 15, 1994 letter from Mr. John Palmer of the Ohio EPA to Mr. Terry Bradway at American Steel Foundries, John listed a notice of deficiencies for the Supplementary Annual Report for the 1993 Ground Water Monitoring of the Sebring Landfill.

In a July 22, 1994 letter subtitled "Response to Groundwater Comments", American Steel Foundries Addressed Mr. Palmer's notice of Deficiencies from the July 15, 1994 letter.

In a July 22, 1994 letter to Mr. Terry Bradway of American Steel Foundries, Mr. John Palmer of the Ohio EPA listed his notice of deficiencies for the May 09, 1994 "Sampling Report No. 2" covering the March 15 through 16, 1994 sampling of the groundwater monitoring wells at the Sebring Landfill.

In a July 27, 1994 letter subtitled "Groundwater Sampling Report Response to Comments", American Steel Foundries responded to Mr. Palmer's July 22, 1994 correspondence.

In an August 05, 1994 Letter subtitled "Sampling Report No. 3" from Mr. John Oesch, Plant Manager, American Steel Foundries submitted the sampling report for the June 15 through 17, 1994 sampling of the groundwater monitoring wells at the Sebring Landfill.

RMT Inc. performed the fourth sampling of the monitoring wells the week of September 12, 1994. The test results from the sampling have not been received to date.

RMT Inc. is preparing a summary report of the first four quarterly sampling events in accordance with the approved Groundwater Quality Assessment Plan for the Sebring Facility.

TEST RESULTS AND SAMPLING SUMMARY

Our experiments to reduce lead and cadmium in Electric Arc Furnace dust continue.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period. Our scrap mixture was changed in January of 1994 to include the addition of 10% obsolete plate. Its impact on our furnace operation is being evaluated.

American Waste and BFI have also sampled several waste streams during the previous period and test results have been received. See attachment "B"

Waste stream profile test results for the soil removed from under the Electric Arc Furnace Baghouse Hazardous Waste Management Unit were determined to be nonhazardous by "TCLP" analysis and are included in attachment "C".

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,


J. F. Oesch
PLANT MANAGER

TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: BMW/RSW
JW
RML
RBR

Ohio EPA
Chief, Division of Solid and Hazardous Waste
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43268-0149

Z 309 033 157

Ohio EPA
Division of Solid and Hazardous Waste
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Z 309 033 158

Ohio EPA
Supervisor, division of Solid and Infectious Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Z 309 033 159

Edward J Brosius, ESQ.
Amsted Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

P. C. Schillawski
Squire Sanders & Dempsey
4900 Society Center
127 Public Square
Cleveland, Ohio 44114-1304

Z 309 033 160

Mahoning County Health District
Chief, Solid Waste Program
2801 Market Street
Youngstown, Ohio 44507-1649
Attn: R.D.Setty

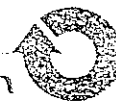
Z 309 033 161

ATTACHMENT "A"

RESAMPLE SAMPLE ANALYSIS REQUEST FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES

Facility Address:

1001 E. BROADWAY ST.

ALLIANCE

OHIO

44601

City

State

ZIP

Stream Number:

CS1373

Date Results Needed: 7 TO 10 DAYS

Waste Code:

D006, D008

Frequency: EACH BOX

Volume:

Generator's Description / Identification of Waste:

EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 091594A

BOX NO. No No.

Request Submitted by: T.C. BRADWAY

Date Submitted: 9/15/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling:

9/15/94

Time of Sampling: Composite AM/PM

Sampler's Name:

T.C. BRADWAY

Title and Affiliation of Sampler:

ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature:

T.C. Bradway

Witness's Name:

Title and Affiliation of Witness:

Witness's Signature:

J. H. L. M. D. D.

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 09/14/94
Envirite Waste ID#: CS1373

Sample Collection Date: 09/01/94
Date Analysis Completed: 09/09/94

Waste Description: EAF Furnace Dust

BOX #: 118

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.73 S.U.
Total CN (As Received)	0.55 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.5 mg/L
TCLP Chromium	0.12 mg/L
TCLP Lead	6.5 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/RC Coordinator

cc: File
TSR: tmc

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 08/12/94
Envirite Waste ID#: CS1373

Sample Collection Date: 08/01/94
Date Analysis Completed: 08/10/94

Waste Description: EAF Furnace Dust

BOX #: 110

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.6 S.U.
Total CN (As Received)	0.56 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.1 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	6.8 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.011 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QA/QC Coordinator

cc: File
TSA: tmo

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6236
FAX#: 216-821-4568		FAX#: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES

Facility Address: 1001 E. BROADWAY ST.

ALLIANCE

OHIO

44601

City

State

ZIP

Stream Number:

CS1373

Date Results Needed: 7 TO 10 DAYS

Waste Code:

D006, D008

Frequency: EACH BOX

Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 080194A

BOX NO. 110

Request Submitted by: T.C. BRADWAY

Date Submitted: 8/1/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling:

8/1/94

Time of Sampling: Composite AM/PM

Sampler's Name:

T.C. BRADWAY

Title and Affiliation of Sampler:

ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature:

T.C. Bradway

Witness's Name:

Title and Affiliation of Witness:

Witness's Signature:

J. M. G.

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 08/05/94
Envirite Waste ID#: CS1373

Sample Collection Date: 07/26/94
Date Analysis Completed: 08/02/94

Waste Description: EAF Furnace Dust

BOX #: 111

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.2 S.U.
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.4 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	10.0 mg/L
TCLP Mercury	0.0015 mg/L
TCLP Nickel	0.42 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QA/QC Coordinator

cc: File
TSR: tmc

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY
SAMPLE NO. 072694 A BOX NO. 111

Request Submitted by: T.C. BRADWAY

Date Submitted: 7/26/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 7/26/94 Time of Sampling: Composite AM/PM

Sampler's Name: T.C. BRADWAY

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature:

Witness's Name:

Title and Affiliation of Witness:

Witness's Signature:

ENVCHCDY . EAF

Please submit sample promptly. Organic analyses must be completed within
14 days of sample collection; otherwise, resampling will be necessary.

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE
CORPORATION



(SAMPLE LOST)

AMERICAN STEEL FOUNDRIES

Generator Name:

Facility Address:

1001 E. BROADWAY ST.

ALLIANCE

OHIO

44601

City

State

ZIP

Stream Number:

CS1373

Date Results Needed: 7 TO 10 DAYS

Waste Code:

D006, D008

Frequency: EACH BOX

Volume:

Generator's Description / Identification of Waste:

EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 070594A

BOX NO. 150

Request Submitted by: T.C. BRADWAY

Date Submitted: 7/6/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling:

7/5/94

Time of Sampling: Composite AM/PM

Sampler's Name:

T.C. BRADWAY

Title and Affiliation of Sampler:

ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature:

T.C. Bradway

Witness's Name:

Title and Affiliation of Witness:

Witness's Signature:

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

ATTACHMENT "B"



CORPORATE WASTE
APPROVAL GROUP

BROWNING-FERRIS INDUSTRIES

DATE : 08/31/94
BFI Location : WILLOWCREEK LP
BFI Initiator : CABANTA, A.
Generator : AMERICAN STEEL FOUNDRIES
Generator Location : ALLIANCE, OH
Waste Description : SOIL/LIMESTONE/SLAG/SAND/DUST
WCD Number : AB39088
BFI Number : 221794

WASTE APPROVAL FORM

Safety Precautions : Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial:

Facility.. BFI Mahoning, Willowcreek, Lorain, & Glenwillow

Comments:

Approved for one time only disposal.

The following items were received by the Corporate Waste Approval Group:

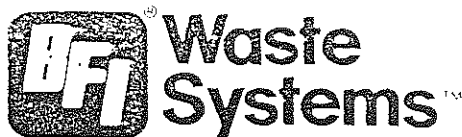
- a. Analytical data from Quanterra Environmental Services
- b. Chains of Custody

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition & physical properties to that as defined above. This waste stream has been assigned BFI Waste Code: OH/855;219;218;217/950831/221794

See Attachment "C" for TCLP INFO

CORPORATE WASTE APPROVAL GROUP

DIANA L. LASCO
TECHNICAL REPRESENTATIVE



BROWNING-FERRIS INDUSTRIES

WCD No. AB

OH 355, 219, 218, 950831, 221799
BFI WASTE CODE 317

WASTE APPROVAL REQUEST

BFI to complete this area.

BFI Initiator: A/Cazanta
Location: Twinsburg
Company Number: 217 1611
Telephone: (216) 947-2543
Fax: (216) 947-2724
Date: 8-29-97

Action Requested: ☒ New Waste Approval
☐ Up-Date Approval - Previous Number: _____
Disposal Site Requested: 217 218 219 851
Company Number: _____
Management Method Requested: ☒ Landfill ☐ Hauling
☐ Other _____

WASTE CHARACTERIZATION DATA
SPECIAL WASTE

IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED.

1. GENERATOR INFORMATION

a) Generator's Name: AMERICAN STEEL FOUNDRIES
b) Generating Facility's Address: 1001 E. BROADWAY ST.
City: ALLAHEE State: OH Zip: 44661
c) Generator's Representative: T.C. BROADWAY
Title: ENVIRONMENTAL MANAGER
Telephone: (216) 823-6150
Fax: (216) 823-6150
d) Emergency/Information Contact: SAME
Title: _____
Telephone: () _____

e) State/Provincial/Local Registration No.: N/A
Generator's EPA Id. No.: 01HD931090416
Industry Description/SIC Code: 3325
f) Customer's Name: SAME
g) Customer's Mailing Address: _____
City: _____ State: _____ Zip: _____
h) Representative: _____
Telephone: () _____
Fax: () _____

2. GENERAL WASTE STREAM INFORMATION

a) Name/Description of The Waste: SOIL, LIMESTONE, SLAG SAND, FOUNDRY SAND AND EAF DUST
b) Process Generating Waste: CLEAN UP CLOSURE UNDER EAF DUST COLLECTOR
(EAF USED IN SECONDARY STEEL PRODUCTION)
c) Is this a treatment residue of a waste which was previously a restricted hazardous waste? ☐ Yes ☒ No
If yes, describe the waste and the process generating the waste prior to treatment: _____
d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Regulations? ☐ Yes ☒ No
If yes, enter the Waste Identification Number if one has been assigned: _____
e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State, Provincial, or local Regulations?
☒ Yes ☐ No If yes, enter Waste Identification Number: N/A
f) Recommended primary protection equipment and special handling procedures: _____
NONE
g) Anticipated Volume: 150 ☒ Cubic Yards ☐ Tons ☐ Gallons ☐ Cubic Meters ☐ Tonnes(metric)
Other: _____ Per: ☐ Year ☐ Month ☐ Week ☐ Day ☒ One Time ☐ Other _____
To be transported in: ☒ Bulk ☐ Drums (type/size) _____ ☐ Other _____
h) Is a representative sample included? ☒ Yes ☐ No

3. WASTE PROPERTIES AT 72°F

a) Physical State:
☒ Solid ☐ Semi-solid
☐ Powder ☐ Liquid
☐ Combination
b) Layers:
☒ Single-layered ☐ Bi-layered ☐ Multi-layered
c) Color(s):
Describe BLACK, BROWN, TAN, REDDISH BROWN
d) Odor:
Describe _____
☒ None ☐ Mild ☐ Strong
e) Density Range: _____ to _____
☒ N/D ☐ lbs/gal. ☐ g/cc.
☐ lbs./yd.³ ☐ Kg/m³ ☐ Other _____
f) Flash Point, °F:
☐ ≤ 72 ☐ 73-100 ☐ 101-140
☐ 141-200 ☐ ≥ 201 ☐ N/A ☒ N/D
g) pH:
☐ ≤ 2 ☐ 2.1-5.0 ☐ 5.1-9.0
☐ 9.1-12.4 ☐ ≥ 12.5 ☐ N/A ☒ N/D

BFI WASTE CODE

4. REACTIVITY	5. THIS WASTE CONTAINS	6. SPECIAL WASTE COMPOSITION																														
<p>Note if the waste exhibits any of the following reactive properties:</p> <p> <input type="checkbox"/> Water Reactive <input type="checkbox"/> Acid Reactive <input type="checkbox"/> Alkaline Reactive <input type="checkbox"/> Oxidizer <input type="checkbox"/> Autopolymerizable <input type="checkbox"/> Pyrophoric <input type="checkbox"/> Explosive <input type="checkbox"/> Thermally Sensitive <input type="checkbox"/> Shock Sensitive <input checked="" type="checkbox"/> None of the above </p>	<p>Note if the waste contains any of the following: If any are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6.</p> <table style="width:100%;"> <tr> <td><input type="checkbox"/> Free Liquids</td> <td><input type="checkbox"/> OSHA Substances</td> </tr> <tr> <td><input type="checkbox"/> Free Cyanide</td> <td><input type="checkbox"/> Etiological Agents</td> </tr> <tr> <td><input type="checkbox"/> Free Sulfide</td> <td><input type="checkbox"/> Pathogens</td> </tr> <tr> <td><input type="checkbox"/> Free Ammonia</td> <td><input type="checkbox"/> Biological Materials</td> </tr> <tr> <td><input type="checkbox"/> Dioxins</td> <td><input type="checkbox"/> Radioactive Materials</td> </tr> <tr> <td><input type="checkbox"/> Organic Solvents</td> <td><input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761</td> </tr> <tr> <td><input type="checkbox"/> Virgin Oils</td> <td><input checked="" type="checkbox"/> None of the Above</td> </tr> <tr> <td><input type="checkbox"/> Used Oils</td> <td></td> </tr> </table>	<input type="checkbox"/> Free Liquids	<input type="checkbox"/> OSHA Substances	<input type="checkbox"/> Free Cyanide	<input type="checkbox"/> Etiological Agents	<input type="checkbox"/> Free Sulfide	<input type="checkbox"/> Pathogens	<input type="checkbox"/> Free Ammonia	<input type="checkbox"/> Biological Materials	<input type="checkbox"/> Dioxins	<input type="checkbox"/> Radioactive Materials	<input type="checkbox"/> Organic Solvents	<input type="checkbox"/> PCBs not regulated by TSCA 40 CFR 761	<input type="checkbox"/> Virgin Oils	<input checked="" type="checkbox"/> None of the Above	<input type="checkbox"/> Used Oils		<p>Concentration ranges are suggested and units must be identified in percentages (%) and/or parts per million (ppm). Attach additional pages if necessary.</p> <table style="width:100%;"> <thead> <tr> <th style="text-align: left;">Components</th> <th style="text-align: right;">Range Min. / Max.</th> </tr> </thead> <tbody> <tr> <td><u>Sand</u></td> <td style="text-align: right;"><u>10%</u></td> </tr> <tr> <td><u>Limestone</u></td> <td style="text-align: right;"><u>15%</u></td> </tr> <tr> <td><u>Slag</u></td> <td style="text-align: right;"><u>35%</u></td> </tr> <tr> <td><u>Foundry Sand</u></td> <td style="text-align: right;"><u>25%</u></td> </tr> <tr> <td><u>Sand</u></td> <td style="text-align: right;"><u>10%</u></td> </tr> <tr> <td><u>EAF DUST</u></td> <td style="text-align: right;"><u>5%</u></td> </tr> </tbody> </table>	Components	Range Min. / Max.	<u>Sand</u>	<u>10%</u>	<u>Limestone</u>	<u>15%</u>	<u>Slag</u>	<u>35%</u>	<u>Foundry Sand</u>	<u>25%</u>	<u>Sand</u>	<u>10%</u>	<u>EAF DUST</u>	<u>5%</u>
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<p align="center">7. TRANSPORTATION INFORMATION</p> <p>If the waste is a DOT Hazardous Material, complete the following:</p> <p>Proper USDOT Shipping Name: _____</p> <p>USDOT Hazard Class: _____ UN or NA Number: _____ CERCLA Reportable Quantity: _____</p>																																
<p align="center">8. SUPPLEMENTAL INFORMATION</p> <p> <input type="checkbox"/> None <input type="checkbox"/> MSD Sheets <input checked="" type="checkbox"/> Analytical Data <input type="checkbox"/> Chain of Custody <input type="checkbox"/> Memo/Letter <input type="checkbox"/> Waste Composition <input type="checkbox"/> Other - describe: _____ No. of Pages: _____ </p>																																
<p align="center">9. GENERATOR'S CERTIFICATION</p> <p>I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omissions of composition or properties exist, that all known or suspected hazards have been disclosed, and that the waste is not a regulated hazardous waste by the USEPA, by an applicable State or Provincial authority, or by any applicable local authority, and does not contain PCBs regulated by TSCA (i.e., 40 CFR 761) or any Provincial authority.</p> <p>GENERATOR'S AUTHORIZED SIGNATORY as identified in Section 1 (c):</p> <table style="width:100%;"> <tr> <td style="width:15%;"><u>8/25/94</u></td> <td style="width:25%;"><u>T.C. Broadway</u></td> <td style="width:25%;"><u>T.C. Broadway</u></td> <td style="width:35%;"><u>ENVIRONMENTAL MANAGER</u></td> </tr> <tr> <td>DATE</td> <td>PRINT NAME</td> <td>SIGNATURE</td> <td>TITLE</td> </tr> </table>			<u>8/25/94</u>	<u>T.C. Broadway</u>	<u>T.C. Broadway</u>	<u>ENVIRONMENTAL MANAGER</u>	DATE	PRINT NAME	SIGNATURE	TITLE																						
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DATE	PRINT NAME	SIGNATURE	TITLE																													
<p align="center">REPRESENTATIVE SAMPLE CERTIFICATION</p> <p>This Section is to be completed by the person obtaining the sample of the above described waste.</p> <p>I certify that the sample for which analytical data was provided on the waste described above is representative of that waste and was collected and preserved in a manner consistent with accepted technical standards.</p> <table style="width:100%;"> <tr> <td style="width:50%;"> <p>Lab sample assigned to: <u>QUANTARA</u></p> <p>Collector's Name: <u>TERRY C. BROADWAY</u></p> <p>Signature: <u>Terry C. Broadway</u></p> <p>Company: <u>AMERICAN STEEL INDUSTRIES</u></p> <p>Title: <u>ENVIRONMENTAL MANAGER</u></p> <p>Telephone Number: <u>(216) 823-6150 Ext # 206</u></p> <p>Date Collected: <u>AUGUST 2 THROUGH 13, 1994</u></p> </td> <td style="width:50%; vertical-align: top;"> <p align="center">(peel off label)</p> <p>Generator's Name: _____</p> <p>Waste Description: _____</p> <p>Date Collected: _____</p> <p>WCD No. AB <u>39088</u></p> </td> </tr> </table>			<p>Lab sample assigned to: <u>QUANTARA</u></p> <p>Collector's Name: <u>TERRY C. BROADWAY</u></p> <p>Signature: <u>Terry C. Broadway</u></p> <p>Company: <u>AMERICAN STEEL INDUSTRIES</u></p> <p>Title: <u>ENVIRONMENTAL MANAGER</u></p> <p>Telephone Number: <u>(216) 823-6150 Ext # 206</u></p> <p>Date Collected: <u>AUGUST 2 THROUGH 13, 1994</u></p>	<p align="center">(peel off label)</p> <p>Generator's Name: _____</p> <p>Waste Description: _____</p> <p>Date Collected: _____</p> <p>WCD No. AB <u>39088</u></p>																												
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WASTE
PROFILE
INFORMATION
FORM

ENVIRITE

CORPORATION



If you need help with this form, please consult your Envirite Technical Marketing Representative
or refer to **Instructions for Completing Waste Profile Information Form.**

CS1762

I. CUSTOMER INFORMATION:

Name of Generator American Steel Foundries SIC _____
Facility Address 1001 S. Broadway Alliance OH 44601
Street City State ZIP
Pickup Address 1001 S. Broadway Alliance OH 44601
Street City State ZIP
Primary Contact Terry Bradway Title Env. Mgr. Phone 216-821-6150
Technical Contact Terry Bradway Title Env. Mgr. Phone 216-821-6150
Emergency Contact Terry Bradway After-hours Phone 216-821-6150
Parent Company n/a.
Generator USEPA ID# OH0981090418 Generator State ID# n/a.
Customer Address for Invoicing American Steel Foundries
P.O. Box 2060 Alliance OH 44601
Street City State ZIP
Contact Phone

II. WASTE INFORMATION:

Generator's Description/Identification of Waste Soil from Area "A" Closure.
Physical State at 20°C (68°F) — (Check one box.) ☒ Solid ☐ Powder ☐ Sludge ☐ Liquid
Other Characteristics — (Must complete "Color" and "Number of Phases." Complete others if known.)
Color Black / Brown TOX UNK ppm BOD UNK ppm Percent Free Liquid 0
Number of Phases 1 Oils/Grease UNK ppm TOC UNK ppm Flash Point >240 °F
Percent Solids 100 pH UNK

Generator Storage Method — (Check one box.)

☐ Tank ☒ Roll Off ☐ Dump Trailer ☐ Bags ☐ Drums ☐ Surface Impoundment ☐ Other _____

Does this waste contain flammables? ☐ Yes ☒ No Comments _____

Does this waste have an obvious odor? ☐ Yes ☒ No If "yes," describe _____

Does this waste produce any explosive, combustible or toxic gases upon neutralization with lime? ☐ Yes ☒ No

Comments: _____

Waste Quantity:

Estimated Volume 1 y³ Estimated Frequency 1 X

SHADED AREA FOR ENVIRITE USE ONLY

STREAM NUMBER _____	DATE ENTERED _____	DATE NEEDED _____
TREATMENT FACILITY: Canton _____	Harvey _____	York _____
		TMR _____

V. WASTE CONSTITUENTS:

The waste constituent information may be supplied either on the basis of the generator's knowledge or laboratory analysis. It must be comprehensive, as it will be used to ensure the health and safety of our laboratory personnel and as a comparison to Enviro's analysis of the representative sample submitted. Please address **each** line entry. Also, note that "TOTAL," not leachable, concentrations are requested below. All unmarked units will be assumed to be mg/kg. If other units are used, please include the proper units with the concentration. If you need help with this section, consult your Enviro Technical Marketing Representative or refer to *Instructions for Completing Waste Profile Information Form*.

METALS

	TOTAL CONCENTRATION
Aluminum	<u>n/s</u>
Arsenic	<u> </u>
Barium	<u> </u>
Beryllium	<u> </u>
Boron	<u> </u>
Cadmium	<u>present</u>
Chromium	<u> </u>
Chromium (+6)	<u> </u>
Copper	<u> </u>
Iron	<u> </u>
Lead	<u>present</u>
Manganese	<u>n/s</u>
Mercury	<u> </u>
Nickel	<u> </u>
Selenium	<u> </u>
Silver	<u> </u>
Tin	<u> </u>
Zinc	<u> </u>
Other	<u> </u>

ANIONS

	TOTAL CONCENTRATION
Chloride	<u>n/s</u>
Sulfate	<u> </u>
Nitrate	<u> </u>
Fluoride	<u> </u>
Phosphate	<u> </u>

CHELATING AGENTS

	TOTAL CONCENTRATION
Ammonia	<u>n/s</u>
Cyanide Total	<u> </u>
Cyanide Amenable	<u> </u>
Cyanide Leachable	<u> </u>
Other	<u> </u>

VOLATILE ORGANIC COMPOUNDS

	TOTAL CONCENTRATION
Acrylonitrile (vinyl cyanide)	<u>n/s</u>
Benzene	<u> </u>
Bis(chloromethyl) ether	<u> </u>
Methylene chloride	<u> </u>
Methylchloromethyl ether	<u> </u>
Methyl ethyl ketone	<u> </u>
Tetrachloroethylene	<u> </u>
Trichloroethylene	<u>present</u>
Vinyl chloride	<u>n/s</u>
Carbon tetrachloride	<u> </u>
Chloroform	<u> </u>
Other	<u> </u>
Other	<u> </u>
Other	<u> </u>

SEMI-VOLATILE ORGANIC COMPOUNDS

	TOTAL CONCENTRATION
1,2-Diphenylhydrazine	<u>n/s</u>
1-Naphthylamine	<u> </u>
2-Naphthylamine	<u> </u>
Anthracene	<u> </u>
Benzidine	<u> </u>
Dioxins	<u> </u>
Ethyleneimine	<u> </u>
N-Nitrosodimethylamine	<u> </u>
p-Nitrosodiphenylamine	<u> </u>
Phenol	<u> </u>
Other	<u> </u>
Other	<u> </u>
Other	<u> </u>

GENERAL

	TOTAL CONCENTRATION
Asbestos	<u>n/s</u>
Carcinogens	<u> </u>
Herbicides	<u> </u>
PCBs	<u> </u>
Pesticides	<u> </u>
Radioactives	<u> </u>
Solvents	<u> </u>
Organometallic Compounds	<u> </u>
Other	<u> </u>
Other	<u> </u>
Other	<u> </u>

III. PROCESS INFORMATION:

The information provided in this Section will be used by Enviro to verify the waste codes identified in Section IV. Please describe in detail the process which generates this waste. (Include plating activity [i.e., nickel, chrome, copper], raw solutions and base metals being plated.) It is important for this information to describe the process that actually **generates** the waste, namely the process that **first causes the waste to be regulated as hazardous**. (Attach additional sheets or diagrams if necessary.)

Area Closure activities at two areas inside facility

This is a composite of the two areas

This is a composite of Area A only.

Are other products used in this area which may contaminate the waste (i.e., cleaning solutions or any other chemicals used by maintenance personnel)? ☐ Yes ☒ No If "yes," identify material and attach copy of *Material Safety Data Sheet* if available.

Material: _____

Are paint-stripping operations on site? ☐ Yes ☒ No

Are cyanide-plating operations on site? ☐ Yes ☒ No

IV. HAZARDS INFORMATION:

Is the waste a RCRA Hazardous Waste as described per 40 CFR 261 or equivalent state regulations? ☐ Yes ☒ No
Please identify all EPA Hazardous-Waste Numbers which apply to the waste by placing an "X" in the box next to the codes specified below. In the blank space(s) provided, please specify any (all) other Hazardous-Waste Numbers that apply.

Characteristic Hazardous Wastes

- | | |
|---|--|
| <input type="checkbox"/> D001 (Oxidizers) | <input type="checkbox"/> D007 (Chromium) |
| <input type="checkbox"/> D002 (Corrosive) | <input type="checkbox"/> D008 (Lead) |
| <input type="checkbox"/> D003 (Reactive) | <input type="checkbox"/> D009 (Mercury) |
| <input type="checkbox"/> D004 (Arsenic) | <input type="checkbox"/> D010 (Selenium) |
| <input type="checkbox"/> D005 (Barium) | <input type="checkbox"/> D011 (Silver) |
| <input type="checkbox"/> D006 (Cadmium) | |
| <input type="checkbox"/> Other _____ | |

Listed Hazardous Wastes

- | | | |
|-------------------------------|--------------------------------------|-------------------------------|
| <input type="checkbox"/> F006 | <input type="checkbox"/> K002 | <input type="checkbox"/> K007 |
| <input type="checkbox"/> F007 | <input type="checkbox"/> K003 | <input type="checkbox"/> K008 |
| <input type="checkbox"/> F008 | <input type="checkbox"/> K004 | <input type="checkbox"/> K062 |
| <input type="checkbox"/> F009 | <input type="checkbox"/> K005 | |
| <input type="checkbox"/> F011 | <input type="checkbox"/> K006 | |
| <input type="checkbox"/> F012 | | |
| <input type="checkbox"/> F019 | <input type="checkbox"/> Other _____ | |

Does the waste contain free liquid?* ☐ Yes ☒ No

Is the waste subject to Land Disposal Restrictions (LDR) per 40 CFR 268 or its equivalent state regulations? ☐ Yes ☒ No

Does this waste require treatment to conform to Land Disposal Restrictions? ☐ Yes ☒ No ☐ Varies

Per the LDR program's definition, the waste is a: ☐ Wastewater† ☒ Nonwastewater**

Has EP Toxicity, TCLP or any other testing been done? ☐ Yes ☒ No If "yes," please attach a copy of the most recent reports.

Does the liquid portion of the RCRA Hazardous Waste contain nickel ≥ 134 mg/l? ☒ No ☐ Yes Specify. _____ mg/l

Does the liquid portion of the RCRA Hazardous Waste contain thallium ≥ 130 mg/l? ☒ No ☐ Yes Specify. _____ mg/l

If the waste is not a RCRA Hazardous Waste as described by federal or state regulation, is it regulated as a "special waste" in the state from which it is being shipped? ☐ Yes ☐ No ☒ Not Applicable Please provide applicable codes.

* As determined by Method 9095 (Paint Filter Liquids Test) described in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods." (EPA Publication No. SW-846, 2nd edition)

† "Wastewaters" are wastes that contain less than 1% total organic carbon (TOC) and less than 1% total suspended solids (Nonfilterable Residues Test — Method No. 160.2 Methods for Chemical Analysis of Water and Wastes, EPA — 600/4-79-020, March 1983).

** "Nonwastewaters" are those wastes that do not meet the definition of "Wastewaters."

VI. TRANSPORTATION INFORMATION:

Proper DOT Shipping Name non regulated

DOT Hazard Class N/A DOT UN/NA Number N/A

Will the temperature of the waste to be transported ever be greater than 110°F? ☐ Yes ☒ No

Comments: _____

Are special precautions required at the time of pickup? ☐ Yes ☒ No If "yes," indicate precautions: _____

Is Enviro handling transportation? ☒ Yes ☐ No ☐ Unresolved If "no," and you know who will be transporting the waste, please complete the following information:

Transporter Name _____

Transporter EPA ID# _____ State Transporter ID# _____

Transporter Contact _____ Phone _____

After-hours Emergency Contact _____ Phone _____

VII. SAMPLING:

Type of Sampler — (Check one box.) ☐ Coli-wasa ☐ Sludge Judge ☐ Auger ☒ Other Grab

Is this a composite sample? ☒ Yes ☐ No If "yes," indicate how many samples: 4

Identify source of sample (e.g., lagoon, tank, etc.) DRUMS

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

Date of Sampling 8/22/94 Time of Sampling 11:10 AM/PM

Sampler's Signature T.C. Bradway

Sampler's Name T.C. BRADWAY

Title and Affiliation of Sampler ENVIRONMENTAL MANAGER American Steel Foundries

VIII. CERTIFICATION:

I hereby avow that any pertinent information that is known by the generator concerning possible hazards has been disclosed in the information contained herein and attached to this form. I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative of the waste that will be shipped to Enviro. I confirm that, to the best of my knowledge, all statements and attachments are correct and accurate representations of this waste material.

Signature T.C. Bradway

Title ENVIRONMENTAL Manager

Name T.C. Bradway

Date 09/01/94

All information submitted on this form and its attachments will be kept confidential within the limits of existing environmental laws and regulations. We suggest that you retain a copy of this form and its attachments for your records.

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 10/06/94
Envirite Waste ID#: CS1762

Sample Collection Date: 08/22/94
Date Analysis Completed: 09/09/94

Waste Description: Soil from Area "A" Closure, non-hazardous

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	10.5 S.U.
Total CN (As Received)	0.55 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	<0.14 mg/L
TCLP Chromium	0.60 mg/L
TCLP Lead	<0.64 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	0.70 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.032 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/QC Coordinator

cc: File
TSR: tmc

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

8E-653-R4782
PARTS WASHER SERVICE
FLUID RECOVERY SERVICES

PREQUALIFICATION EVALUATION

PAGE 1 OF 3
COMPLETED: 09/09/94
REVISED:
RUN: 09/10/94

ACCEPT FOR SHIPMENT

BRANCH/SUBMITTER: 404003
AKRON



CONTROL #: 227221-3
LAB #: 37868-6
SAMPLE #: 344179

GENERATOR INFORMATION: CUSTOMER NUMBER: 4040-03-9789

AMERICAN STEEL FOUNDRIES
1001 E BROADWAY
ATTN TERRY BRADWAY
ALLIANCE, OH 44601

ATTN: TERRY BRADWAY

BRANCH: 404003 - AKRON

GENERAL DESCRIPTION: CARBURATOR CLEANER

NATURE OF BUSINESS: STEEL FOUNDRY

S.I.C.:

STATUS: LQG

FACILITY ADDRESS: MANIFEST

BILLING ADDRESS:

1001 E BROADWAY
ATTN TERRY BRADWAY
ALLIANCE, OH 44601

PROCESS DESCRIPTION: OLD OUTDATED MATERIAL

GENERATION AMOUNT: 20 GALLONS ONE TIME ONLY

P.O. #:

DATE SURVEY SIGNED: 08/23/94

CONTACT: TERRY BRADWAY

TITLE: ENV COORD

PHN: 216-823-6150

CORPORATE REVIEW:

DISPOSITION: ACCEPT FOR SHIP

PART NUMBER: 0082102

WASTE, N-SPEC FUEL-55

REVIEW DATE: 09/09/1994

REVIEWERS: MJK

APPROVED FACILITIES:

SAFETY-KLEEN CORP.
633 E 138TH ST
DOLTON, IL 60419

SAFETY-KLEEN CORP.
3700 LAGRANGE ROAD
SMITHFIELD, KY 40068
KYD053348108

FED EPA#: ILD980613913

STATE EPA#: 0310690006

TELEPHONE: 7088494850

5028452453

STATE AUTH: 000162

APPROVED DOT - SHIPPING DESCRIPTION

0001094 DRUM OR BULK

RQ HAZARDOUS WASTE, LIQUID, N.O.S.
9 NA3082 PG III (F002)(ERG#31)

US EPA WASTE CODES: F002

D021

D026

D027

D039

USA

REVIEW COMMENTS:

*
* OK FOR HIGH CHLORINE FUEL.

THIS SERVES AS NOTICE PER 40 CFR 264.12(B) THAT EACH FACILITY NOTED ABOVE
S THE APPROPRIATE PERMITS, IS CAPABLE, HAS CAPACITY AND IS WILLING TO
...CEPT THE MATERIAL AS DESCRIBED IN THE APPROVAL SECTION.

81363-R4782
PARTS WASHER SERVICE
FLUID RECOVERY SERVICES

PREQUALIFICATION EVALUATION

PAGE 2 OF 3
COMPLETED: 09/09/94
REVISED:
RUN: 09/10/94

ACCEPT FOR SHIPMENT

BRANCH/SUBMITTER: 404003
AKRON

CONTROL #: 227221-3
LAB #: 37868-6
SAMPLE #: 344179

GENERAL ANALYSIS OF TOTAL SAMPLE

COLOR : BROWN
WATER CONTENT : 12.5 WT%
NON-VOLATILE RESIDUE: 12.6 WT% DESCRIPTION: SOLID
FLAMMABILITY : NO FLASH AT 75 F BY SETAFLASH
FLAMMABILITY : NO FLASH AT 142 F BY SETAFLASH
PH : DIRECT BY METER 8.7
RADIOACTIVITY : NONE DETECTED
COMMENTS: AQ LAYER IS DK BROWN/EMS = YES

FUEL EVALUATION OF TOTAL SAMPLE

HEAT CONTENT	:	10100 BTU/LB	ASH UPON COMBUSTION	:	0.5 WT%
TOTAL FLUORINE	F	< 0.1	TOTAL CHLORINE	CL:	27.1 WT%
TOTAL BROMINE	BR	< 0.1	TOTAL SULFUR	S :	0.2 WT%

GENERAL COMPOSITION:

COMPOSITION BY:

APPEARANCE
(VOL%)

TOTAL
(WT%)

AQUEOUS PHASE (FREE WATER)	84.0	84.0
ORGANIC PHASE (FEEDSTOCK)	16.0	16.0
BOTTOM SLUDGE (SEMISOLIDS)	0.0	0.0
BOTTOM SOLID (SETTLED SOLIDS)	0.0	0.0
TOTAL	100.0	100.0

TOTAL PHASE SPECIFIC GRAVITY: 1.100 VISCOSITY (CENTIPOISE): < 50 CPS

SPECIFIC COMPOSITION OF TOTAL SAMPLE

COMPOSITION OF:

TOTAL
SAMPLE
(WT%)

TOTAL
SAMPLE
(WT%)

WATER CONTENT	12.5	12.5
NON-VOLATILE RESIDUE	12.6	12.6
VOLATILE ORGANICS BY DIFFERENCE	74.9	74.9
TOTAL	100.0	100.0

81563-R4782
PARTS WASHER SERVICE
FLUID RECOVERY SERVICES

PREQUALIFICATION EVALUATION

PAGE 3 OF 3
COMPLETED: 09/09/94
REVISED:
RUN: 09/10/94

ACCEPT FOR SHIPMENT

BRANCH/SUBMITTER: 404003
AKRON

CONTROL #: 227221-3
LAB #: 37868-6
SAMPLE #: 344179

VOLATILE ORGANIC COMPOSITION OF TOTAL SAMPLE BY GAS CHROMATOGRAPHY

SAMPLE PREPARATION METHODS: CS2-EXTRACT

DETECTION METHODS : FID, FID

COMPOSITION OF:		VOLATILE ORGANICS (WT%)	TOTAL SAMPLE (WT%)
COMPOUND NAME			
DICHLOROBENZENE, ORTHO-		39.0	29.2
CODE: ODCB CAS NUMBER:	95-50-1		
METHYLENE CHLORIDE		15.3	11.5
CODE: MECL CAS NUMBER:	75-09-2		
DICHLOROBENZENE, PARA-	(D027)	15.2	11.4
CODE: PDCB CAS NUMBER:	106-46-7		
DICHLOROBENZENE, META-		7.2	5.4
CODE: MDCB CAS NUMBER:	541-73-1		
CRESOLS (METHYLPHENOLS, ORTHO-, META-, & PARA-)	(D026)	6.1	4.6
CODE: CSLS CAS NUMBER:	1319-77-3		
MEDIUM-BOILING ALIPHATIC HYDROCARBONS (C9-C13)		4.5	3.4
CODE: MHC CAS NUMBER:	8030-30-6		
PHENOL		4.3	3.2
CODE: PHL CAS NUMBER:	108-95-2		
XYLENOLS (DIMETHYLPHENOLS, 2,4-, 2,6-, & 3,5-)		3.2	2.4
CODE: XYNS CAS NUMBER:	1300-71-6		
CHLOROBENZENE	(D021)	2.7	2.0
CODE: MCB CAS NUMBER:	108-90-7		
TOTAL OTHERS (<1.0% EACH)		1.4	1.0
CODE: TO CAS NUMBER:			
PERCHLOROETHYLENE	(D039)	1.1	0.8
CODE: PERC CAS NUMBER:	127-18-4		
TOTAL		100.0	74.9

SPECIFIC ORGANIC COMPOSITION

POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

LABORATORY REVIEW: A SEG CODE: REVIEWERS: KLT KLT LAB: PREQ NEW CASTLE
RELEASED: 09/08/94 ANALYZED: 09/08/94 SUBMITTED: 08/26/94

THE ANALYSIS CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF
QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN CORP. IN
ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS REQUIRED UNDER 40 CFR PART 268.
EPA WASTE CODES FOR LDR: F002 D021 D026 D027 D039
ANALYSIS DOES NOT INDICATE THAT MATERIAL IS CALIFORNIA LIST HALOGENATED ORGANIC
COMPOUND WASTE.

J01-F005 COMPOUND CODES FOR LDR NOTICE: MECL PERC MCB ODCB CSLS

81363-R4782
PARTS WASHER SERVICE
AMERICAN STEEL FOUNDRIES

PREQUALIFICATION EVALUATION
MANIFEST INFORMATION

REVISED:
RUN: 09/10/94
CONTROL #: 227221-3
SAMPLE #: 344179

REQUIRED MANIFEST FORM: GN

SAFETY-KLEEN CORP. PROVIDES THIS MANIFESTING INFORMATION FOR INSTRUCTIONAL PURPOSES ONLY. ALL THE INFORMATION IS BELIEVED TO BE ACCURATE, BUT IS KNOWN TO BE INCOMPLETE. FEDERAL AND STATE REGULATIONS AND THE INSTRUCTIONS ON THE MANIFEST FORM SHOULD BE CONSULTED FOR COMPLETE INFORMATION. IN ADDITION, CERTAIN VARIATIONS MAY BE ALLOWED BY REGULATIONS, BUT NEED TO BE APPROVED BY A SAFETY-KLEEN REPRESENTATIVE PRIOR TO SHIPMENT.

UNIFORM HAZARDOUS WASTE MANIFEST	1. GENERATORS US EPA NO.	DOCUMENT NO.	2. PAGE 1	<u>UNDERLINED AREAS ARE REQUIRED</u>	
3. GENERATOR NAME AND MAILING ADDRESS AMERICAN STEEL FOUNDRIES 1001 E BROADWAY ALLIANCE OH 44601			A. STATE MANIFEST DOCUMENT NO B. STATE GENERATOR ID		
4. GENERATOR PHONE 216 823 6150					
5. TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.	6. US EPA ID NO ILD984908202	C. ST TRANS ID D. TRANSPORTER PHONE <u>2166733340</u>			
7. TRANSPORTER 2 CO NAME	8. US EPA ID NO	E. ST TRANS ID F. TRANSPORTER PHONE			
9. FACILITY NAME AND SITE ADDRESS SAFETY-KLEEN CORP. 3700 LAGRANGE ROAD SMITHFIELD KY 40068		10. US EPA ID NUMBER KYD053348108		G. FACILITY STATE ID H. FACILITY PHONE <u>502 845 2453</u>	
11. US DOT DESCRIPTION A. RQ HAZARDOUS WASTE, LIQUID, N.O.S. 9 NA3082 PG III (F002)(ERG#31)			CONTAINER	I. WASTE NO <u>F002</u> <u>D021</u>	
J. ADDITIONAL DESCRIPTION FOR THE MATERIALS LISTED ABOVE IA) D026 D027 D039				K. HANDLING CODES	
15. SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION EMERGENCY RESP# 708-888-4660					

81363-R4782

PARTS WASHER SERVICE
AMERICAN STEEL FOUNDRIESPREQUALIFICATION EVALUATION
MANIFEST INFORMATION

REVISED:

RUN: 09/10/94

CONTROL #: 227221-3

SAMPLE #: 344179

REQUIRED MANIFEST FORM: GN

SAFETY-KLEEN CORP. PROVIDES THIS MANIFESTING INFORMATION FOR INSTRUCTIONAL PURPOSES ONLY. ALL THE INFORMATION IS BELIEVED TO BE ACCURATE, BUT IS KNOWN TO BE INCOMPLETE. FEDERAL AND STATE REGULATIONS AND THE INSTRUCTIONS ON THE MANIFEST FORM SHOULD BE CONSULTED FOR COMPLETE INFORMATION. IN ADDITION, CERTAIN VARIATIONS MAY BE ALLOWED BY REGULATIONS, BUT NEED TO BE APPROVED BY A SAFETY-KLEEN REPRESENTATIVE PRIOR TO SHIPMENT.

UNIFORM HAZARDOUS WASTE MANIFEST	1. GENERATORS US EPA NO.	DOCUMENT NO.	2. PAGE 1	<u>UNDERLINED AREAS ARE REQUIRED</u>
3. GENERATOR NAME AND MAILING ADDRESS AMERICAN STEEL FOUNDRIES 1001 E BROADWAY ALLIANCE OH 44601			A. STATE MANIFEST DOCUMENT NO B. STATE GENERATOR ID	
4. GENERATOR PHONE 216 823 6150				
5. TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.		6. US EPA ID NO ILD984908202	C. ST TRANS ID D. TRANSPORTER PHONE <u>2166733340</u>	
7. TRANSPORTER 2 CO NAME		8. US EPA ID NO	E. ST TRANS ID F. TRANSPORTER PHONE	
9. FACILITY NAME AND SITE ADDRESS SAFETY-KLEEN CORP. 3700 LAGRANGE ROAD SMITHFIELD KY 40068			10. US EPA ID NUMBER KYD053348108 G. FACILITY STATE ID H. FACILITY PHONE <u>502 845 2453</u>	
11. US DOT DESCRIPTION A. RQ HAZARDOUS WASTE, LIQUID, N.O.S. 9 NA3082 PG III (F002)(ERG#31)			CONTAINER	I. WASTE NO <u>F002</u> <u>D021</u>
J. ADDITIONAL DESCRIPTION FOR THE MATERIALS LISTED ABOVE IA) D026 D027 D039				K. HANDLING CODES
5. SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION EMERGENCY RESP# 708-888-4660				

ATTACHMENT "C"

ENVIRITE CORPORATION

TECHNOLOGY FOR THE ENVIRONMENT

September 1, 1994

American Steel Foundries
1001 E. Broadway
Alliance, Ohio 44601

ATTN: Terry Bradway

Dear Terry:

The soil excavated underneath the EAF dust collector was originally profiled under Envirite approval #CS1744. Upon our analysis, this waste stream is classified as non-hazardous.

Being that this is non-hazardous, and the generation origin is from the EAF dust collector and surrounding areas, County Environmental will accept this waste stream under the WY11089 profile.

Your pricing will be the same as your non-hazardous EAF dust as well as the scheduling procedure.

Feel free to call me at 216-456-6238 with any questions.

Sincerely,



Tina Caputo

TMR

TC/dg

cc: Sam Pantuso

WASTE
PROFILE
INFORMATION
FORM

WASTE STREAM
CS-1744

ENVIRITE

CORPORATION



If you need help with this form, please consult your Envirite Technical Marketing Representative
or refer to Instructions for Completing Waste Profile Information Form.

I. CUSTOMER INFORMATION:

Name of Generator AMERICAN STEEL FOUNDRIES SIC 3325
Facility Address 1001 EAST BROADWAY ST. ALLIANCE, OH 44601
Pickup Address 1001 EAST BROADWAY ST. ALLIANCE, OH 44601
Primary Contact T.C. BRADWAY Title ENV. MGR Phone 216-823-6150
Technical Contact T.C. BRADWAY Title ENV. MGR Phone 216-823-6150
Emergency Contact TC BRADWAY After-hours Phone 216-823-6150
Parent Company AMSTED INDUSTRIES
Generator USEPA ID# OH D981090418 Generator State ID# _____
Customer Address for Invoicing 1001 EAST BROADWAY ST.
ALLIANCE, OH 44601
T.C. BRADWAY 216-823-6150
Contact Phone

II. WASTE INFORMATION:

Generator's Description/Identification of Waste EAF ~~CO2~~ DUST COLLECTOR CLOSURE MATERIAL

Physical State at 20°C (68°F) — (Check one box.) ☒ Solid ☐ Powder ☐ Sludge ☐ Liquid

Other Characteristics — (Must complete "Color" and "Number of Phases." Complete others if known.)

Color BLACK TOX UNK ppm BOD _____ ppm Percent Free Liquid 0
Number of Phases 1 Oils/Grease UN ppm TOC _____ ppm Flash Point > 200 °F
Percent Solids 100 pH UNK

Generator Storage Method — (Check one box.)

☐ Tank ☒ Roll Off ☐ Dump Trailer ☐ Bags ☐ Drums ☐ Surface Impoundment ☐ Other _____

Does this waste contain flammables? ☐ Yes ☒ No Comments _____

Does this waste have an obvious odor? ☐ Yes ☒ No If "yes," describe _____

Does this waste produce any explosive, combustible or toxic gases upon neutralization with lime? ☐ Yes ☒ No

Comments: _____

Waste Quantity:
Estimated Volume 160 YD³ Estimated Frequency ONE TIME

SHADED AREA FOR ENVIRITE USE ONLY

STREAM NUMBER _____ DATE ENTERED 8/10/94 DATE NEEDED 8/24/94

TREATMENT FACILITY: Canton ☒ Harvey _____ York _____ TMR CAPUTO

VI. TRANSPORTATION INFORMATION:

Proper DOT Shipping Name RQ, HAZARDOUS WASTE, SOLID, N.O.S. (BARIUM, CADMIUM, LEAD)
DOT Hazard Class 9 DOT UN/NA Number NA 3077 PG III

Will the temperature of the waste to be transported ever be greater than 110°F? ☐ Yes ☒ No

Comments: _____

Are special precautions required at the time of pickup? ☐ Yes ☒ No If "yes," indicate precautions: _____

Is Envirote handling transportation? ☒ Yes ☐ No ☐ Unresolved If "no," and you know who will be transporting the waste, please complete the following information:

Transporter Name _____

Transporter EPA ID# _____ State Transporter ID# _____

Transporter Contact _____ Phone _____

After-hours Emergency Contact _____ Phone _____

VII. SAMPLING:

Type of Sampler — (Check one box.) ☐ Coliwasa ☐ Sludge Judge ☐ Auger ☒ Other

Is this a composite sample? ☒ Yes ☐ No If "yes," indicate how many samples: _____

Identify source of sample (e.g., lagoon, tank, etc.) ROLL-OFF

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

Date of Sampling 8/10/94 Time of Sampling 2:45 AM/PM PM

Sampler's Signature T.C. Broadway

Sampler's Name T.C. BROADWAY

Title and Affiliation of Sampler ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

VIII. CERTIFICATION:

I hereby avow that any pertinent information that is known by the generator concerning possible hazards has been disclosed in the information contained herein and attached to this form. I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative of the waste that will be shipped to Envirote. I confirm that, to the best of my knowledge, all statements and attachments are correct and accurate representations of this waste material.

Signature T.C. Broadway

Name T.C. BROADWAY Print

Title ENVIRONMENTAL MANAGER

Date 8/10/94

All information submitted on this form and its attachments will be kept confidential within the limits of existing environmental laws and regulations. We suggest that you retain a copy of this form and its attachments for your records.

V. WASTE CONSTITUENTS:

The waste constituent information may be supplied either on the basis of the generator's knowledge or laboratory analysis. It must be comprehensive, as it will be used to ensure the health and safety of our laboratory personnel and as a comparison to Enviro's analysis of the representative sample submitted. Please address each line entry. Also, note that "TOTAL," not leachable, concentrations are requested below. All unmarked units will be assumed to be mg/kg. If other units are used, please include the proper units with the concentration. If you need help with this section, consult your Enviro Technical Marketing Representative or refer to *Instructions for Completing Waste Profile Information Form*.

METALS

	TOTAL CONCENTRATION
Aluminum	unk
Arsenic	1
Barium	present
Beryllium	unk
Boron	1
Cadmium	present
Chromium	present
Chromium (+6)	present unk
Copper	unk
Iron	1
Lead	present
Manganese	unk
Mercury	
Nickel	
Selenium	
Silver	
Tin	
Zinc	
Other	

ANIONS

	TOTAL CONCENTRATION
Chloride	none
Sulfate	
Nitrate	
Fluoride	
Phosphate	

CHELATING AGENTS

	TOTAL CONCENTRATION
Ammonia	none
Cyanide Total	
Cyanide Amenable	
Cyanide Leachable	
Other	

VOLATILE ORGANIC COMPOUNDS

	TOTAL CONCENTRATION
Acrylonitrile (vinyl cyanide)	none
Benzene	
Bis(chloromethyl) ether	
Methylene chloride	
Methylchloromethyl ether	
Methyl ethyl ketone	
Tetrachloroethylene	
Trichloroethylene	
Vinyl chloride	
Carbon tetrachloride	
Chloroform	
Other	
Other	
Other	

SEMI-VOLATILE ORGANIC COMPOUNDS

	TOTAL CONCENTRATION
1,2-Diphenylhydrazine	none
1-Naphthylamine	
2-Naphthylamine	
Anthracene	
Benzidine	
Dioxins	
Ethyleneimine	
N-Nitrosodimethylamine	
p-Nitrosodiphenylamine	
Phenol	
Other	
Other	
Other	

GENERAL

	TOTAL CONCENTRATION
Asbestos	none
Carcinogens	
Herbicides	
PCBs	
Pesticides	
Radioactives	
Solvents	
Organometallic Compounds	
Other	
Other	
Other	

III. PROCESS INFORMATION:

The information provided in this Section will be used by Enviro to verify the waste codes identified in Section IV. Please describe in detail the process which generates this waste. (Include plating activity [i.e., nickel, chrome, copper], raw solutions and base metals being plated.) It is important for this information to describe the process that actually generates the waste, namely the process that first causes the waste to be regulated as hazardous. (Attach additional sheets or diagrams if necessary.)

ELECTRIC ARC FURNACE COLLECTION AREA HAS BEEN EXCAVATED.
THE MATERIAL IS SOME EAF DUST, SOIL, SAND, LIMESTONE
AND CLAY IN NATURE.

Are other products used in this area which may contaminate the waste (i.e., cleaning solutions or any other chemicals used by maintenance personnel)? ☐ Yes ☒ No If "yes," identify material and attach copy of Material Safety Data Sheet if available.

Material: _____

Are paint-stripping operations on site? ☐ Yes ☒ No

Are cyanide-plating operations on site? ☐ Yes ☒ No

IV. HAZARDS INFORMATION:

Is the waste a RCRA Hazardous Waste as described per 40 CFR 261 or equivalent state regulations? ☒ Yes ☐ No
Please identify all EPA Hazardous-Waste Numbers which apply to the waste by placing an "X" in the box next to the codes specified below. In the blank space(s) provided, please specify any (all) other Hazardous-Waste Numbers that apply.

Characteristic Hazardous Wastes		Listed Hazardous Wastes		
<input type="checkbox"/> D001 (Oxidizers)	<input type="checkbox"/> D007 (Chromium)	<input type="checkbox"/> F006	<input type="checkbox"/> K002	<input type="checkbox"/> K007
<input type="checkbox"/> D002 (Corrosive)	<input checked="" type="checkbox"/> D008 (Lead)	<input type="checkbox"/> F007	<input type="checkbox"/> K003	<input type="checkbox"/> K008
<input type="checkbox"/> D003 (Reactive)	<input type="checkbox"/> D009 (Mercury)	<input type="checkbox"/> F008	<input type="checkbox"/> K004	<input type="checkbox"/> K062
<input type="checkbox"/> D004 (Arsenic)	<input type="checkbox"/> D010 (Selenium)	<input type="checkbox"/> F009	<input type="checkbox"/> K005	
<input checked="" type="checkbox"/> D005 (Barium)	<input type="checkbox"/> D011 (Silver)	<input type="checkbox"/> F011	<input type="checkbox"/> K006	
<input checked="" type="checkbox"/> D006 (Cadmium)		<input type="checkbox"/> F012		
<input type="checkbox"/> Other _____		<input type="checkbox"/> F019	<input type="checkbox"/> Other _____	

Does the waste contain free liquid?* ☐ Yes ☒ No

Is the waste subject to Land Disposal Restrictions (LDR) per 40 CFR 268 or its equivalent state regulations? ☒ Yes ☐ No

Does this waste require treatment to conform to Land Disposal Restrictions? ☒ Yes ☐ No ☐ Varies

Per the LDR program's definition, the waste is a: ☐ Wastewater† ☒ Nonwastewater**

Has EP Toxicity, TCLP or any other testing been done? ☐ Yes ☒ No If "yes," please attach a copy of the most recent reports.

Does the liquid portion of the RCRA Hazardous Waste contain nickel ≥ 134 mg/l? ☒ No ☐ Yes Specify. _____ mg/l

Does the liquid portion of the RCRA Hazardous Waste contain thallium ≥ 130 mg/l? ☒ No ☐ Yes Specify. _____ mg/l

If the waste is not a RCRA Hazardous Waste as described by federal or state regulation, is it regulated as a "special waste" in the state from which it is being shipped? ☐ Yes ☐ No ☒ Not Applicable Please provide applicable codes.

* As determined by Method 9095 (Paint Filter Liquids Test) described in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods." (EPA Publication No. SW-846, 2nd edition)

† "Wastewaters" are wastes that contain less than 1% total organic carbon (TOC) and less than 1% total suspended solids (Nonfilterable Residues Test — Method No. 160.2 Methods for Chemical Analysis of Water and Wastes, EPA — 600/4-79-020, March 1983).

** "Nonwastewaters" are those wastes that do not meet the definition of "Wastewaters."

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 10/06/94
Envirite Waste ID#: CS1744

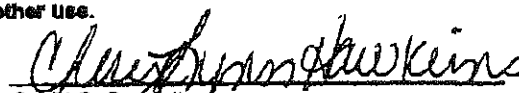
Sample Collection Date: 08/10/94
Date Analysis Completed: 08/15/94

Waste Description: EAF dust collector closure material

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	9.14 S.U.
Total CN (As Received)	0.53 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	0.30 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	0.32 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/QC Coordinator

cc: File
TSR: tmc

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

ANALYTICAL REPORT

TERRY BRADWAY

AMERICAN STEEL FOUNDRIES

QUANTERRA INCORPORATED


Alesia M. Danford
Project Manager

August 25, 1994

PROJECT NARRATIVE

The following report contains the analytical results for thirteen solid samples and one water sample submitted to Quanterra-North Canton by American Steel Foundries. The samples were received August 15, 1994, according to documented sample acceptance procedures.

Quanterra-North Canton utilizes only USEPA approved methods and instrumentation in all analytical work. The samples presented in this report were analyzed for the parameters listed on the following page in accordance with the methods indicated. A summary of QC data for these analyses is included at the end of the report.

Results were provided by facsimile transmission to Terry Bradway at American Steel Foundries on August 23, 1994.

ANALYTICAL METHODS SUMMARY

<u>Parameters</u>	<u>Methods</u>
TCLP Extraction	SW846 1311
Silver	SW846 6010
Arsenic	SW846 6010
Barium	SW846 6010
Cadmium	SW846 6010
Chromium	SW846 6010
Lead	SW846 6010
Selenium	SW846 6010
Mercury	SW846 7470
Mercury	SW846 7471

References:

- SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, September, 1986 and it's updates.

SAMPLE SUMMARY

The analytical results of the samples listed below are presented on the following pages.

<u>WO #</u>	<u>LABORATORY ID</u>	<u>SAMPLE IDENTIFICATION</u>
Q4898	A4H150038-001	BOX #116 BAGHOUSE-SOUTH 8-2-94 10:00AM
Q4899	A4H150038-002	BOX #111 BAGHOUSE 8-2-94 11:50AM
Q4900	A4H150038-003	BOX #135 BAGHOUSE-CENTRAL 8-3-94 8:00AM
Q4901	A4H150038-004	BOX #110 BAGHOUSE-CENTRAL 8-3-94 9:10AM
Q4902	A4H150038-005	BFI #1 BAGHOUSE-NORTH 8-3-94 2:00PM
Q4903	A4H150038-006	BFI #2 BAGHOUSE-ONLY 8-3-94 3:20PM
Q4904	A4H150038-007	BFI #3 BAGHOUSE-NORTH 8-4-94 7:30AM
Q4905	A4H150038-008	BFI #4 BAGHOUSE-CENTRAL 8-8-94 7:30AM
Q4906	A4H150038-009	BIN #128 BAGHOUSE-NORTH 8-8-94 11:00AM
Q4907	A4H150038-010	BIN #137 BAGHOUSE-NORTH 8-8-94 11:30AM
Q4909	A4H150038-011	#6002Y03 BAGHOUSE-NORTH 8-8-94 3:10PM
Q4910	A4H150038-012	BIN #378 BAGHOUSE-NORTH 8-9-94 8:15PM
Q4912	A4H150038-013	BIN #2510 BAGHOUSE-NORTH 8-9-94 10:00AM
Q4915	A4H150038-014	081394 DECON WATER 8-13-94 8:00AM

AMERICAN STEEL FOUNDRIES

BOX #116 BAGHOUSE-SOUTH 8-2-94 10:00AM

WO #: Q4898
LAB #: A4H150038-001
MATRIX: SOLID

DATE SAMPLED: 8/02/94
DATE RECEIVED: 8/15/94
TCLP EXTRACTION DATE: 8/19/94
FINAL PH:6.4

----- RCRA METALS -----

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	8/22/94	4234028
Arsenic	ND	0.50	mg/L	SW846 6010	8/22/94	4234028
Barium	1.0	1.0	mg/L	SW846 6010	8/22/94	4234028
Cadmium	0.20	0.10	mg/L	SW846 6010	8/22/94	4234028
Chromium	ND	0.10	mg/L	SW846 6010	8/22/94	4234028
Lead	0.59	0.10	mg/L	SW846 6010	8/22/94	4234028
Selenium	ND	0.30	mg/L	SW846 6010	8/22/94	4234028
Mercury	ND	0.020	mg/L	SW846 7471	8/22- 8/23/94	4234028

NOTE: AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT

AMERICAN STEEL FOUNDRIES

BOX #111 BAGHOUSE 8-2-94 11:50AM

WO #: Q4899
LAB #: A4H150038-002
MATRIX: SOLID

DATE SAMPLED: 8/02/94
DATE RECEIVED: 8/15/94
TCLP EXTRACTION DATE: 8/19/94
FINAL PH:5.7

----- RCRA METALS -----

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Arsenic	ND	0.50	mg/L	SW846 6010	8/22- 8/23/94	4234028
Barium	ND	1.0	mg/L	SW846 6010	8/22- 8/23/94	4234028
Cadmium	0.13	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Chromium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Lead	3.0	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Selenium	ND	0.30	mg/L	SW846 6010	8/22- 8/23/94	4234028
Mercury	ND	0.020	mg/L	SW846 7471	8/22- 8/23/94	4234028

NOTE: AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT

AMERICAN STEEL FOUNDRIES

BOX #135 BAGHOUSE-CENTRAL 8-3-94 8:00AM

WO #: Q4900

LAB #: A4H150038-003

MATRIX: SOLID

DATE SAMPLED: 8/03/94

DATE RECEIVED: 8/15/94

TCLP EXTRACTION DATE: 8/19/94

FINAL PH:6.4

----- RCRA METALS -----

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING</u> <u>LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION -</u> <u>ANALYSIS DATE</u>	<u>QC</u> <u>BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Arsenic	ND	0.50	mg/L	SW846 6010	8/22- 8/23/94	4234028
Barium	1.2	1.0	mg/L	SW846 6010	8/22- 8/23/94	4234028
Cadmium	0.16	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Chromium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Lead	0.26	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Selenium	ND	0.30	mg/L	SW846 6010	8/22- 8/23/94	4234028
Mercury	ND	0.020	mg/L	SW846 7471	8/22- 8/23/94	4234028

NOTE: AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT

AMERICAN STEEL FOUNDRIES

BOX #110 BAGHOUSE-CENTRAL 8-3-94 9:10AM

WO #: Q4901
LAB #: A4H150038-004
MATRIX: SOLID

DATE SAMPLED: 8/03/94
DATE RECEIVED: 8/15/94
TCLP EXTRACTION DATE: 8/19/94
FINAL PH:6.4

- - - - - RCRA METALS - - - - -

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Arsenic	ND	0.50	mg/L	SW846 6010	8/22- 8/23/94	4234028
Barium	1.4	1.0	mg/L	SW846 6010	8/22- 8/23/94	4234028
Cadmium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Chromium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Lead	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Selenium	ND	0.30	mg/L	SW846 6010	8/22- 8/23/94	4234028
Mercury	ND	0.020	mg/L	SW846 7471	8/22- 8/23/94	4234028

NOTE: AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT

AMERICAN STEEL FOUNDRIES

BFI #1 BAGHOUSE-NORTH 8-3-94 2:00PM

WO #: Q4902
LAB #: A4H150038-005
MATRIX: SOLID

DATE SAMPLED: 8/03/94
DATE RECEIVED: 8/15/94
TCLP EXTRACTION DATE: 8/19/94
FINAL PH: 6.7

----- RCRA METALS -----

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Arsenic	ND	0.50	mg/L	SW846 6010	8/22- 8/23/94	4234028
Barium	ND	1.0	mg/L	SW846 6010	8/22- 8/23/94	4234028
Cadmium	0.18	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Chromium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Lead	0.16	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Selenium	ND	0.30	mg/L	SW846 6010	8/22- 8/23/94	4234028
Mercury	ND	0.020	mg/L	SW846 7471	8/22- 8/23/94	4234028

NOTE: AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT

AMERICAN STEEL FOUNDRIES

BFI #2 BAGHOUSE-ONLY 8-3-94 3:20PM

WO #: Q4903
LAB #: A4H150038-006
MATRIX: SOLID

DATE SAMPLED: 8/03/94
DATE RECEIVED: 8/15/94
TCLP EXTRACTION DATE: 8/19/94
FINAL PH:6.6

----- RCRA METALS -----

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Arsenic	ND	0.50	mg/L	SW846 6010	8/22- 8/23/94	4234028
Barium	1.1	1.0	mg/L	SW846 6010	8/22- 8/23/94	4234028
Cadmium	0.12	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Chromium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Lead	0.19	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Selenium	ND	0.30	mg/L	SW846 6010	8/22- 8/23/94	4234028
Mercury	ND	0.020	mg/L	SW846 7471	8/22- 8/23/94	4234028

NOTE: AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT

AMERICAN STEEL FOUNDRIES

BFI #3 BAGHOUSE-NORTH 8-4-94 7:30AM

WO #: Q4904
LAB #: A4H150038-007
MATRIX: SOLID

DATE SAMPLED: 8/04/94
DATE RECEIVED: 8/15/94
TCLP EXTRACTION DATE: 8/19/94
FINAL PH: 6.7

- - - - - RCRA METALS - - - - -

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Arsenic	ND	0.50	mg/L	SW846 6010	8/22- 8/23/94	4234028
Barium	ND	1.0	mg/L	SW846 6010	8/22- 8/23/94	4234028
Cadmium	0.30	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Chromium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Lead	0.28	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Selenium	ND	0.30	mg/L	SW846 6010	8/22- 8/23/94	4234028
Mercury	ND	0.020	mg/L	SW846 7471	8/22- 8/23/94	4234028

NOTE: AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT

AMERICAN STEEL FOUNDRIES

BFI #4 BAGHOUSE-CENTRAL 8-8-94 7:30AM

WO #: Q4905
LAB #: A4H150038-008
MATRIX: SOLID

DATE SAMPLED: 8/08/94
DATE RECEIVED: 8/15/94
TCLP EXTRACTION DATE: 8/19/94
FINAL PH:6.6

- - - - - RCRA METALS - - - - -

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Arsenic	ND	0.50	mg/L	SW846 6010	8/22- 8/23/94	4234028
Barium	ND	1.0	mg/L	SW846 6010	8/22- 8/23/94	4234028
Cadmium	0.26	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Chromium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Lead	0.21	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Selenium	ND	0.30	mg/L	SW846 6010	8/22- 8/23/94	4234028
Mercury	ND	0.020	mg/L	SW846 7471	8/22- 8/23/94	4234028

NOTE: AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT

AMERICAN STEEL FOUNDRIES

BIN #128 BAGHOUSE-NORTH 8-8-94 11:00AM

WO #: Q4906
LAB #: A4H150038-009
MATRIX: SOLID

DATE SAMPLED: 8/08/94
DATE RECEIVED: 8/15/94
TCLP EXTRACTION DATE: 8/19/94
FINAL PH:6.5

----- RCRA METALS -----

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING</u> <u>LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION -</u> <u>ANALYSIS DATE</u>	<u>QC</u> <u>BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Arsenic	ND	0.50	mg/L	SW846 6010	8/22- 8/23/94	4234028
Barium	ND	1.0	mg/L	SW846 6010	8/22- 8/23/94	4234028
Cadmium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Chromium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Lead	0.12	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Selenium	ND	0.30	mg/L	SW846 6010	8/22- 8/23/94	4234028
Mercury	ND	0.020	mg/L	SW846 7471	8/22- 8/23/94	4234028

NOTE: AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT

AMERICAN STEEL FOUNDRIES

BIN #137 BAGHOUSE-NORTH 8-8-94 11:30AM

WO #: Q4907
LAB #: A4H150038-010
MATRIX: SOLID

DATE SAMPLED: 8/08/94
DATE RECEIVED: 8/15/94
TCLP EXTRACTION DATE: 8/19/94
FINAL PH:6.4

- - - - - RCRA METALS - - - - -

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Arsenic	ND	0.50	mg/L	SW846 6010	8/22- 8/23/94	4234028
Barium	1.0	1.0	mg/L	SW846 6010	8/22- 8/23/94	4234028
Cadmium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Chromium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Lead	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Selenium	ND	0.30	mg/L	SW846 6010	8/22- 8/23/94	4234028
Mercury	ND	0.020	mg/L	SW846 7471	8/22- 8/23/94	4234028

NOTE: AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT

AMERICAN STEEL FOUNDRIES

#6002Y03 BAGHOUSE-NORTH 8-8-94 3:10PM

WO #: Q4909
LAB #: A4H150038-011
MATRIX: SOLID

DATE SAMPLED: 8/08/94
DATE RECEIVED: 8/15/94
TCLP EXTRACTION DATE: 8/19/94
FINAL PH: 6.4

- - - - - RCRA METALS - - - - -

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Arsenic	ND	0.50	mg/L	SW846 6010	8/22- 8/23/94	4234028
Barium	1.0	1.0	mg/L	SW846 6010	8/22- 8/23/94	4234028
Cadmium	0.13	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Chromium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Lead	0.14	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Selenium	ND	0.30	mg/L	SW846 6010	8/22- 8/23/94	4234028
Mercury	ND	0.020	mg/L	SW846 7471	8/22- 8/23/94	4234028

NOTE: AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT

AMERICAN STEEL FOUNDRIES

BIN #378 BAGHOUSE-NORTH 8-9-94 8:15PM

WO #: Q4910
LAB #: A4H150038-012
MATRIX: SOLID

DATE SAMPLED: 8/09/94
DATE RECEIVED: 8/15/94
TCLP EXTRACTION DATE: 8/19/94
FINAL PH: 6.5

----- RCRA METALS -----

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Arsenic	ND	0.50	mg/L	SW846 6010	8/22- 8/23/94	4234028
Barium	ND	1.0	mg/L	SW846 6010	8/22- 8/23/94	4234028
Cadmium	0.10	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Chromium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Lead	0.11	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Selenium	ND	0.30	mg/L	SW846 6010	8/22- 8/23/94	4234028
Mercury	ND	0.020	mg/L	SW846 7471	8/22- 8/23/94	4234028

NOTE: AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT

AMERICAN STEEL FOUNDRIES

BIN #2510 BAGHOUSE-NORTH 8-9-94 10:00AM

WO #: Q4912

DATE SAMPLED: 8/09/94

LAB #: A4H150038-013

DATE RECEIVED: 8/15/94

MATRIX: SOLID

TCLP EXTRACTION DATE: 8/19/94

FINAL PH:6.5

----- RCRA METALS -----

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Arsenic	ND	0.50	mg/L	SW846 6010	8/22- 8/23/94	4234028
Barium	1.1	1.0	mg/L	SW846 6010	8/22- 8/23/94	4234028
Cadmium	0.11	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Chromium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Lead	0.10	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Selenium	ND	0.30	mg/L	SW846 6010	8/22- 8/23/94	4234028
Mercury	ND	0.020	mg/L	SW846 7471	8/22- 8/23/94	4234028

NOTE: AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT

AMERICAN STEEL FOUNDRIES

081394 DECON WATER 8-13-94 8:00AM

WO #: Q4915
LAB #: A4H150038-014
MATRIX: WATER

DATE SAMPLED: 8/13/94
DATE RECEIVED: 8/15/94
TCLP EXTRACTION DATE: 8/19/94
FINAL PH: 7.0

- - - - - RCRA METALS - - - - -

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching
Procedure Method 1311 (55 FR 26986)

PARAMETER	RESULT	REPORTING LIMIT	UNIT	METHOD	PREPARATION - ANALYSIS DATE	QC BATCH
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Arsenic	ND	0.50	mg/L	SW846 6010	8/22- 8/23/94	4234028
Barium	ND	1.0	mg/L	SW846 6010	8/22- 8/23/94	4234028
Cadmium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Chromium	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Lead	ND	0.10	mg/L	SW846 6010	8/22- 8/23/94	4234028
Selenium	ND	0.30	mg/L	SW846 6010	8/22- 8/23/94	4234028
Mercury	ND	0.020	mg/L	SW846 7470	8/22- 8/23/94	4234028

WATER DOES NOT GO TO THE
LANDFILL
TCB
8/29/94

NOTE: AS RECEIVED
ND NOT DETECTED AT THE STATED REPORTING LIMIT

QUALITY CONTROL SECTION

QUALITY CONTROL NARRATIVE

The results included in this report have been reviewed for compliance with the laboratory QA/QC plan. All data have been found to be compliant with laboratory protocol.

CHECK SAMPLE REPORT

LAB #: A4H150038

*** TCLP ***

TCLP EXTRACTION DATE: 8/19/94

----- METALS -----

COMPOUND	SPIKE PERCENT RECOVERY	Q/C LIMITS	PREPARATION - ANALYSIS DATE
BATCH:4234028			
Silver	102	(50-150)	8/22/94
Arsenic	102	(50-150)	8/22/94
Barium	96	(50-150)	8/22/94
Cadmium	100	(50-150)	8/22/94
Chromium	101	(50-150)	8/22/94
Mercury	89	(50-150)	8/22- 8/23/94
Lead	97	(50-150)	8/22/94
Selenium	109	(50-150)	8/22/94
BATCH:4234028			
Silver	102	(50-150)	8/22/94
Arsenic	102	(50-150)	8/22/94
Barium	96	(50-150)	8/22/94
Cadmium	100	(50-150)	8/22/94
Chromium	101	(50-150)	8/22/94
Mercury	89	(50-150)	8/22- 8/23/94
Lead	97	(50-150)	8/22/94
Selenium	109	(50-150)	8/22/94

INTRA-LAB BLANK REPORT

LAB #: A4H150038

*** TCLP ***

TCLP EXTRACTION DATE: 8/19/94

METALS

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>
		BATCH:4234028			
Silver	ND	0.10	mg/L	SW846 6010	8/22/94
Arsenic	ND	0.50	mg/L	SW846 6010	8/22/94
Barium	ND	1.0	mg/L	SW846 6010	8/22/94
Cadmium	ND	0.10	mg/L	SW846 6010	8/22/94
Chromium	ND	0.10	mg/L	SW846 6010	8/22/94
Mercury	ND	0.020	mg/L	SW846 7470	8/22- 8/23/94
Mercury	ND	0.020	mg/L	SW846 7471	8/22- 8/23/94
Lead	ND	0.10	mg/L	SW846 6010	8/22/94
Selenium	ND	0.30	mg/L	SW846 6010	8/22/94

NOTE:

ND NOT DETECTED AT THE STATED REPORTING LIMIT

MATRIX SPIKE REPORT

LAB #: A4H150038-001

*** TCLP ***

TCLP EXTRACTION DATE: 8/19/94

METALS

COMPOUND	SPIKE PERCENT RECOVERY	SPIKE/DUP PERCENT RECOVERY	Q/C LIMITS	RPD	RPD LIMITS	PREPARATION - ANALYSIS DATE
BATCH:4234028 MATRIX: SOLID						
Silver	106	103	(50-150)	2.4	(0-20)	8/22/94
Arsenic	105	105	(50-150)	0.28	(0-20)	8/22/94
Barium	101	101	(50-150)	0.49	(0-20)	8/22/94
Cadmium	95	100	(50-150)	5.1	(0-20)	8/22/94
Chromium	102	101	(50-150)	0.78	(0-20)	8/22/94
Mercury	89	104	(50-150)	16	(0-20)	8/22/94
Lead	92	98	(50-150)	6.5	(0-20)	8/22/94
Selenium	112	118	(50-150)	4.9	(0-20)	8/22/94

NOTE:

Calculations are performed before rounding to avoid round-off errors in calculated results

PURCHASE ORDER A-27859

WADSWORTH/ALERT Laboratories

CLIENT CODE _____

QUOTE / SAR NUMBER _____

Chain-of Custody Record

Division of Enseco Incorporated
 4101 SHUFFEL DRIVE N.W./NORTH CANTON, OHIO 44720
 (216) 497-9396 FAX (216) 497-0772

No 29816

PROJ. NO.		PROJECT NAME/LOCATION				NO. OF CONTAINERS	PARAMETER								REMARKS
SAMPLERS: (Signature) <i>T.C. Broadway</i>		AMERICAN STEEL FOUNDRIES					ICLP METALS ONLY SW-846 METHOD B11								
STA. NO.	DATE	TIME	COMP.	GRAB.	STATION LOCATION										
Box #116	8/2/94	10:00M	X		BAGHOUSE - SOUTH	X								EAF BAGHOUSE CLOSURE	
Box #111	8/2/94	11:50AM	X		BAGHOUSE	X								"	
Box #135	8/3/94	8:00AM	X		BAGHOUSE - CENTRAL	X								"	
Box #110	8/3/94	9:10AM	X		BAGHOUSE - CENTRAL	X								"	
BFI #1	8/3/94	2:00PM	X		BAGHOUSE - NORTH	X								"	
BFI #2	8/3/94	3:20PM	X		BAGHOUSE - ONLY	X								"	
BFI #3	8/4/94	7:30AM	X		BAGHOUSE - NORTH	X								"	
BFI #4	8/8/94	7:30AM	X		BAGHOUSE - CENTRAL	X								"	
Bin #128	8/8/94	11:00AM	X		BAGHOUSE - NORTH	X								"	
Bin #137	8/8/94	11:30AM	X		BAGHOUSE - NORTH	X								"	
Bin #2703	8/8/94	3:10PM	X		BAGHOUSE - NORTH	X								"	
Bin #373	8/9/94	8:15AM	X		BAGHOUSE - NORTH	X								"	
Bin #2510	8/9/94	10:00PM	X		BAGHOUSE NORTH	X								"	
Bin #394	8/13/94	8:00AM	X		DECON WATER	X								"	

Relinquished by: (Signature) <i>* RMT</i>	Date / Time 8/15/94 2:00PM	Received by: (Signature) <i>T.C. Broadway</i>	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature) <i>T.C. Broadway</i>	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature)	Date / Time	Received for Laboratory by: (Signature) <i>Miss Ego</i>	Date / Time 8/15/94 2:50	Remarks MR. JIM MARTINELLI - from RESIDUES MANAGEMENT TECHNOLOGY PULLED THE SAMPLES AT THE DIRECTION OF T.C. BROADWAY AT AMERICAN STEEL FOUNDRIES. THIS DOCUMENT WILL BE FAXED TO HIM IN WISCONSIN. SIGNATURE AR: [Signature] TOP: [Signature] DATE: 8/15/94 BE FORWARDED TO WADSWORTH	

Distribution Original Accompanies Shipment. Copy returned with Report.

WADSWORTH/ALERT Laboratories

CLIENT CODE _____

QUOTE / SAR NUMBER _____

Chain-of Custody Record

Division of Enseco Incorporated
4101 SHUFFEL DRIVE N.W./NORTH CANTON, OHIO 44720
(216) 497-9396 FAX (216) 497-0772

No 29816

PROJ. NO.		PROJECT NAME/LOCATION				NO. OF CON- TAINERS	PARAMETER							REMARKS
SAMPLERS: (Signature)							TCLP METALS ONLY SW-846 METHOD 1311							
STA. NO.	DATE	TIME	COMP.	GRAB.	STATION LOCATION									
Box #116	8/2/94	10:00M	X		BAGHOUSE - SOUTH	X							EAP Baghouse Closure	
Box #111	8/2/94	11:50AM	X		BAGHOUSE	X							"	
Box #135	8/3/94	8:00AM	X		BAGHOUSE - CENTRAL	X							"	
Box #110	8/3/94	9:10AM	X		BAGHOUSE - CENTRAL	X							"	
BFI #1	8/3/94	2:00PM	X		BAGHOUSE - NORTH	X							"	
BFI #2	8/3/94	3:20PM	X		BAGHOUSE - NORTH	X							"	
BFI #3	8/4/94	7:30AM	X		BAGHOUSE - NORTH	X							"	
BFI #4	8/8/94	7:30AM	X		BAGHOUSE - CENTRAL	X							"	
BFI #128	8/8/94	11:00AM	X		BAGHOUSE - NORTH	X							"	
BFI #137	8/8/94	11:30AM	X		BAGHOUSE - NORTH	X							"	
BFI #203	8/8/94	3:10PM	X		BAGHOUSE - NORTH	X							"	
BFI #378	8/9/94	8:15AM	X		BAGHOUSE - NORTH	X							"	
BFI #2510	8/9/94	10:00AM	X		BAGHOUSE NORTH	X							"	
BFI #101	8/13/94	8:00AM	X		DECON WATER	X							"	

Relinquished by: (Signature) James M. Martelli	Date / Time 8/17/94 9:00M	Received by: (Signature) T.C. Bradley	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature) T.C. Bradley	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature)	Date / Time	Received for Laboratory by: (Signature)	Date / Time	Remarks: Mr. Jim Martelli - from RESOURCES MANAGEMENT TECHNOLOGY PULLED THE SAMPLES AT THE DIRECTION OF T.C. BRADLEY AT AMERICAN STEEL FOUNDRIES. THIS DOCUMENT WILL BE FAXED TO HIM IN WISCONSIN. THE SIGNATURE AND THIS COPY WITH HIS NAME WILL BE FORWARDED TO WISCONSIN.	

Distribution Original Accompanies Shipment. Copy returned with Report.



JOHN OESCH
PLANT MANAGER

American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150
FAX NO. (216) 821-4568

RECEIVED

JUL 6 1994

July 01, 1994

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

**CERTIFIED LETTER
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Barbara Mazur

P 482 673 315

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

P 482 673 316

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

Progress Report # 9

This submittal is intended to meet the progress report requirements of Section X of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report.

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

RMT Engineering & Environmental Management performed the additional required background sampling on August 30, 1993.

On November 08, 1993, American Steel Foundries submitted a Background Sampling Analysis Plan for the Electric Furnace Baghouse Management Unit to the OEPA.

In a letter dated December 21, 1993, Mr. John Palmer, Environmental Specialist, OEPA, Northeast District Office instructed Mr. Terry Bradway, Environmental Manager, American Steel Foundries to apply for an extension to the (180) day limit requirement of the consent order because the Ohio EPA needed more time to complete their technical review of the Background Sampling Plan for the Electric Arc Furnace Baghouse Management Unit.

In a January 11, 1994 letter, ASF formally requested an extension to the closure limit of the Electric Arc Furnace Baghouse Closure Plan in accordance with the OEPA's directive.

The Ohio EPA granted the extension request on February 03, 1994 in Mr. Donald R. Schregardus's letter to Mr. Terry Bradway.

In a May 09, 1994 letter, Mr. Palmer listed OEPA's technical comments for the document titled Background Sampling and Analysis for Electric Arc Furnace Baghouse Hazardous Waste Management Unit.

Mr. John F. Oesch, Plant Manager, American Steel Foundries formally submitted his response to Mr. Palmer's technical comments in a June 10, 1994 letter.

Mr. Palmer acknowledged receipt of the June 10, 1994 response to comments in his June 15, 1994 letter.

We plan to close the Electric Arc Furnace Baghouse Waste Management Unit during our plant vacation shutdown in the first two weeks of August. However, we are currently awaiting Ohio EPA approval regarding our response to comments of June 10, 1994.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.

4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.

5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.

6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

RMT Engineering and Environmental Management completed the first sampling of the landfill wells in accordance with the Groundwater Quality Assessment Plan during the week of December 13, 1993 and on February 23, 1994 results of the sampling were submitted to the U.S. EPA and Ohio EPA with our recommendations for parameters for the next three sampling events in accordance with the Consent Decree.

In a March 08, 1994 letter to Mr. Terry Bradway, Mr. John Palmer of the Ohio EPA acknowledged receipt of the test results.

Mr. John Palmer of the Ohio EPA approved our recommendations for the groundwater sampling parameters in a letter dated March 11, 1994.

Mr. Palmer's letter of March 11, 1994 also listed several additional comments relative to the groundwater monitoring program at the Sebring Facility.

In Mr. J.F.Oesch's letter of April 01, 1994, ASF responded to Mr. Palmer's March 11, 1994 comments.

In an April 29, 1994 letter, Mr. John Palmer agreed that ASF's response of April 01, 1994 had adequately addressed all issues of concern to the agency.

A third sampling of the groundwater monitoring wells was performed during the week of June 13, 1994. Those results have not been received to date.

RMT will be performing the fourth sampling of the monitoring wells the week of September 12, 1994.

TEST RESULTS AND SAMPLING SUMMARY

Our experiments to reduce lead and cadmium in EAF dust continue.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period. Our scrap mixture was changed in January of 1994 to include the addition of 10% obsolete plate. Its impact on our furnace operation is being evaluated.

American Waste and BFI have also sampled several waste streams during the previous period and test results have been received. See attachment "B"

Envirite Corp. is in process of recertification of our EAF Dust and Smoke Eater waste streams but retest results have not been received to date.

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."


Yours very truly,

J. F. Oesch
PLANT MANAGER

TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: BMW/RSW
JW
DJM
RML
RBR

Ohio EPA
Chief, Division of Solid and Hazardous Waste
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43268-0149

P 482 673 317

Ohio EPA
Division of Solid and Hazardous Waste
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

P 482 673 318

Ohio EPA
Supervisor, division of Solid and Infectious Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

P 482 673 319

Edward J Brosius, ESQ.
Amsted Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

P. C. Schillawski
Squire Sanders & Dempsey
4900 Society Center
127 Public Square
Cleveland, Ohio 44114-1304

P 482 673 320

Mahoning County Health District
Chief, Solid Waste Program
2801 Market Street
Youngstown, Ohio 44507-1649
Attn: R.D.Setty

ATTACHMENT

"A"

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
T.C. Bradway
1001 E. Broadway
Alliance, OH 44601

Report Date: 03/18/94
Envirite Waste ID#: CS1373

Sample Collection Date: 03/01/94
Date Analysis Completed: 03/14/94

Waste Description: EAF Furnace dust

<u>Parameter</u>	<u>Results</u>
pH (As Received)	9.0 S.U.
Total CN (As Received)	0.50 mg/kg
TCLP Arsenic	<0.0077
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.8 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	12.5 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.041 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/QC Coordinator

cc: File
TSR

ENVIRITE CORPORATION
CERTIFICATION ANALYSIS REPORT

American Steel Foundries
T.C. Bradway
1001 E. Broadway
Alliance, OH 44601

Report Date: 03/18/94
Envirite Waste ID#: CS1373


Sample Collection Date: 03/08/94
Date Analysis Completed: 03/15/94

Waste Description: EAF Furnace dust

<u>Parameter</u>	<u>Results</u>
pH (As Received)	9.0 S.U.
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077
TCLP Barium	<1.6 mg/L
TCLP Cadmium	3.1 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	9.8 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	0.38 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/RC Coordinator

cc: File
TSR

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
Mr Terry Bradway
1001 E. Broadway St.
Alliance, Ohio 44601

Report Date: 03/31/94
Envirite Waste ID#: CS1373

Sample Collection Date: 03/22/94
Date Analysis Completed: 03/30/94

Waste Description: EAF Furnace dust

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	5.9 S.U
Total CN (As Received)	0.50 mg/kg
TCLP Arsenic	0.11 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	3.0 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	3.4 mg/L
TCLP Mercury	<0.008 mg/L
TCLP Nickel	0.48 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QA/QC Coordinator

cc: File
TSR

FAX	DATE 3/31/94	PAGES 1	FROM CANTON HAWKINS
TO TERRY BRADWAY	CO. ENVIRITE-CANTON		PH# 216-456-6233
CC Am. Steel Found.	FAX# 216-456-2801		
FAX# 821 456 8			
MESSAGE			

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries

1001 E. Broadway Street

Alliance, Ohio 44601

Report Date: 04/15/94

Envirite Waste ID#: CS1373

Sample Collection Date: 04/06/94

Date Analysis Completed: 04/13/94

Waste Description: EAF Furnace Dust

Parameter	Results
pH (TCLP)	6.6 S. U.
Total CN (As Received)	0.56 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.6 mg/L
TCLP Chromium	0.14 mg/L
TCLP Lead	8.3 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Charles Hawkins
QA/RC Coordinator

CC: File
TSR tmc

FAX	DATE 4/15/94	PAGE 1	FROM CHASELL HAWKINS
TO TERRY BLADIN	CO AMER STEEL FOUND	216-456-6238	216-456-2801
FAX# 216-456-6238	MESSAGE		

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries

1001 E. Broadway Street

Alliance, Ohio 44601

Report Date: 050054/15/94

Envirite Waste ID#: CS1373

Sample Collection Date: 04/2606/94

Date Analysis Completed: 05/04/94

Waste Description: EAF Furnace Dust

Box#: 150

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.6 S.U.
Total CN (As Received)	0.55 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.7 mg/L
TCLP Chromium	0.10 mg/L
TCLP Lead	9.3 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/RQ Coordinatorcc: File
TSR: tmc

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-832-4568		FAX#: 216-456-2801

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

Generator Name:
Generator Address:
Generator City, State, Zip:

American Steel Foundries
1001 E. Broadway Street
Alliance, OH 44601

Report Date: 06/07/94
Envirite Waste ID: CS1373

Sample Collection Date: 06/01/94
Date Analysis Completed: 06/06/94

Waste Description: EAF Furnace Dust
BOX #- 111

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.4
Total CN (AS Received)	1.1 mg/kg
TCLP Arsenic	<0.15 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	5.2 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	7.0 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.16 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Christy Spivey
QA/QC COORDINATOR

cc: File
TSR tmc

FAX	DATE 6/7/94	PAGES 1	FROM <i>Christy Spivey</i>
TO <i>Terry Brady</i>	CO. ENVIRITE-CANTON		PH# 216-456-6233
<i>John Hill</i>	FAX# 216-456-2801		
MESSAGE			

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
1001 E. Broadway Street
Alliance, Ohio 44601

Report Date: 05/24/94
Envirite Waste ID#: CS1373

Sample Collection Date: 05/12/94
Date Analysis Completed: 05/17/94

Waste Description: EAF Furnace Dust BOX #: 101

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.2 S.U.
Total CN (As Received)	0.54 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.6 mg/L
TCLP Chromium	0.10 mg/L
TCLP Lead	6.0 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cheryl Hawkins
QARC Coordinator

cc: File
TSR: tmc

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801



A ATTACHMENT
"B"

American Steel Foundries

1001 EAST BROADWAY * P. O. BOX 2060 * ALLIANCE, OHIO 44601

(216) 823-6150 * FAX NO. (216) 821-4568

January 10, 1994

Certified Mail

Mr. Al Casanta
BFI Willowcreek Landfill
1043 State Route 225
Atwater, Ohio 44201

Dear Sir:

WASTE STREAM CERTIFICATION

This letter is written in response to your letter of January 05, 1994.

Please renew the following waste streams for disposal by BFI for an additional twelve months:

- 1) FLOOR SWEEPINGS FROM STEEL FOUNDRY OPERATION
OH 219 940212 202143 006
- 2) BROKEN CORE BUTTS
OH 219 940212 202145 006
- 3) SPENT REFRACTORY FROM FURNACE & LADLES
OH 219 940212 202144 006
- 4) SPENT FOUNDRY SAND
OH 219 940212 202142 006
- 5) DEWATERED CLARIFIER SLUDGE
OH 219 940326 203178 006

The subject waste streams are essentially the same as when tested during 1993 and changes are not anticipated during the next twelve months. Please renew the certifications for 1994. If a significant change takes place in the composition of any of the subject waste streams, your office will be immediately notified.

If you have any additional requests, comments or concerns, please do not hesitate to call (216) 823-6550 ext. 206.

cc: JFO
RBR
RML
CAR/RSW

Very truly yours,

T.C. Bradway
T.C. Bradway
Environmental Manager

C:\WP51\SOLWASTE\WASTESTR.EAM



CORPORATE WASTE
APPROVAL GROUP

BROWNING-FERRIS INDUSTRIES

DATE : 04/04/94
BFI Location : WILLOWCREEK LE
BFI Initiator : CASANTA, A
Generator : AMERICAN STEEL FOUNDRIES
Generator Location : ALLIANCE, OH
Waste Description : COOLING BED DUST
WCD Number : AB13320
BFI Number : 85485

WASTE APPROVAL FORM

Safety Precautions : Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial:

Facility.. BFI Willowcreek, Mahoning, Lorain County & Glenwillow

Comments:


WCD resigned March 11, 1994 and updated with analysis April 4, 1994.

The following items were received by the Corporate Waste Approval Group:

1. Analysis from DeVor Laboratories.
2. MSD Sheets on Cerel Binder.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition & physical properties to that as defined above. This waste stream has been assigned BFI Waste Code: OH/219:855;217;218/950603/85485

CORPORATE WASTE APPROVAL GROUP


Paula J. Carboni
Technical Representative

#AB13320 COOLING BED DUST

SPECIMEN I.D. NUMBER

94726365

ACCESSION NO.

94 726365

COLLECTION DATE

03/11/94

CLIENT I.D. NUMBER LOCATION

6365

COLLECTION TIME

14:30

RECEIVED

03/14/94

REPORTED

03/29/94

AMERICAN STEEL FOUNDRIES

TEST	RESULT		REFERENCE OR THERAPEUTIC RANGE		UNITS
	NORMAL	ABNORMAL			
TCLP EXTRACTION PROC	FINAL PH=5.03				
TCLP METALS & BIAS %					
ARSENIC	<0.3		0.0	5.0	MG/L
Spike recovery	98				%
BARIUM	<2.0		0.0	100.0	MG/L
Spike recovery	94				%
CADMIUM	<0.03		0.0	1.0	MG/L
Spike recovery	108				%
CHROMIUM	<0.3		0.0	5.0	MG/L
Spike recovery	106				%
SELENIUM	<0.02		0.0	1.0	MG/L
Spike recovery	94				%
MERCURY	<0.003		0.0	0.2	MG/L
Spike recovery	100				%
LEAD	<0.2		0.0	5.0	MG/L
Spike recovery	103				%
SILVER	<0.2		0.0	5.0	MG/L
Spike recovery	73				%
TCLP SUPPL.METALS					
NICKEL	<0.2				MG/L
Spike recovery	105				%
COPPER	<0.08				MG/L
Spike recovery	105				%
REACTIVITY SCREEN	REACTIVE CYANIDE <2.0 PPM REACTIVE SULFIDE <2.0 PPM ASTM D5049 METHOD D/D4978 METHOD B				
CORROSIVITY SCREEN	SAMPLE IS NON-CORROSIVE, PH=9.25 ASTM D4980 METHOD B/USEPA 9040				
IGNITABILITY TEST	SAMPLE HEATED TO 160F WITHOUT FLASH OR IGNITION. ASTM D4982 METHOD B/ASTM D93				
TCLP REVIEW	. . . TCLP PREPARATION FOLLOWS METHOD 1311 SW-846 AS REVISED NOVEMBER 24, 1992 (57FR55114)				

--- DIRECTORS ---

Patrick K. Jaynes Ph.D.

Anthony Nasrallah Ph.D.

7655 Market Street, Suite 2500
Youngstown, Ohio 44512
(216) 758-5788
(800) 365-3396BFI WASTE SYSTEMS
WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 44201

NAME

#AB13320 COOLING BED DUST

SPECIMEN I.D. NUMBER

94726365

ACCESSION NO.

94 726365

COLLECTION DATE

03/11/94

COLLECTION TIME

14:30

RECEIVED

03/14/94
REPORTED

CLIENT I.D. NUMBER LOCATION

6365

00000

03/29/94

AMERICAN STEEL FOUNDRIES

TEST

RESULT

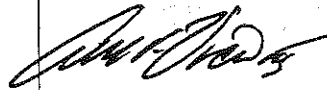
REFERENCE OR
THERAPEUTIC RANGE

UNITS

NORMAL

ABNORMAL

REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR



--- DIRECTORS ---

Patrick K. Jaynes Ph.D.

Anthony Nasrallah Ph.D.

7655 Market Street, Suite 2500
Youngstown, Ohio 44512
(216) 758-5788
(800) 365-3396BFI WASTE SYSTEMS
WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 44201



(800) 365-3396
(216) 758-5788

DeYor Laboratories Inc.
Southwoods Medical-Health Complex

7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY
BROWNING-FERRIS INDUSTRIES

Location: Willow Creek Client# 623

Billing Control # (Lab use only) 94-2723-2

Purchase Order# 219-7837

Generator/Project# American Steel Foundries

LAB ID# 726365 WCD # AB 13320

Waste Description: Cooling Pond Dust

Number of containers 1

Matrix Soil ☒ Solid ☐ Multiphase ☐ Organic/oil

ANALYSES REQUESTED

RUSH Y N

- 553 ☒ TCLP Extraction
546 ☐ Zero Headspace Extraction
548 ☒ Metals + spike recoveries
544 ☒ Supplemental metals + spikes (Copper & Nickel)
585 ☐ UST Priority Panel (Metals + TPH + Rush Service)
578 ☐ Volatiles + spike recoveries
582 ☐ Semi-volatiles + spike recoveries
581 ☐ Pesticides/Herbicides + spike recoveries
1002 ☒ Reactivity Screen
1003 ☒ Corrosivity Screen
859 ☒ Ignitability
511 ☐ Total Petroleum Hydrocarbons (TPH)
569 ☐ BETX
502 ☐ PCB (soil)
☐ Other
245 ☒ Signatory Review

BEI to go for Testing

Sample Taken By:	Date	Time	Company
<i>J.C. Bradley</i>	<i>3-11-94</i>	<i>2:30 PM</i>	<i>A.S.F.</i>
Sample Submitted By:			
Sample Couriered By:			
<i>A. Casanueva</i>	<i>3/14/94</i>	<i>10:00</i>	<i>BEI</i>
Sample Received By:			
<i>Dennis Bradley</i>	<i>3/14/94</i>	<i>10:00</i>	DeYor Laboratories



CORPORATE WASTE
APPROVAL GROUP

BROWNING-FERRIS INDUSTRIES

67

DATE : 04/04/94
BFI Location : WILLOWCREEK LF
BFI Initiator : CASANTA, A
Generator : AMERICAN STEEL FOUNDRIES
Generator Location : ALLIANCE, OH
Waste Description : SHOT BLAST DUST
WCD Number : AB13340
BFI Number : 85484

WASTE APPROVAL FORM

Safety Precautions : Avoid Breathing Dust Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial:

Facility.. BFI Willowcreek, Mahoning, Lorain County & Glenwillow

Comments:

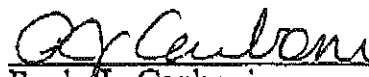
WCD resigned March 11, 1994 and updated with analysis April 4, 1994.

The following items were received by the Corporate Waste Approval Group:

1. Analysis from DeVor Laboratories.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition & physical properties to that as defined above. This waste stream has been assigned BFI Waste Code: OH/219:855;218;217/950603/85484

CORPORATE WASTE APPROVAL GROUP



Paula J. Carboni
Technical Representative

NAME

#AB13340 SHOT BLAST DUST

SPECIMEN I.D. NUMBER

94726367

ACCESSION NO.

94 726367

COLLECTION DATE

03/11/94

COLLECTION TIME

14:30

CLIENT I.D. NUMBER LOCATION

6367

00000

RECEIVED

03/14/94
REPORTED

03/29/94

AMERICAN STEEL FOUNDRIES

TEST	RESULT		REFERENCE OR THERAPEUTIC RANGE		UNITS
	NORMAL	ABNORMAL			
TCLP EXTRACTION PROC	FINAL PH=5.60				
TCLP METALS & BIAS %					
ARSENIC	<0.3		0.0	5.0	MG/L
Spike recovery	112				%
BARIUM	<2.0		0.0	100.0	MG/L
Spike recovery	96				%
CADMIUM	<0.03		0.0	1.0	MG/L
Spike recovery	104				%
CHROMIUM	<0.3		0.0	5.0	MG/L
Spike recovery	108				%
SELENIUM	<0.02		0.0	1.0	MG/L
Spike recovery	105				%
MERCURY	<0.003		0.0	0.2	MG/L
Spike recovery	108				%
LEAD	<0.2		0.0	5.0	MG/L
Spike recovery	105				%
SILVER	<0.2		0.0	5.0	MG/L
Spike recovery	108				%
TCLP SUPPL. METALS					
NICKEL	2.09				MG/L
Spike recovery	99				%
COPPER	<0.08				MG/L
Spike recovery	108				%
REACTIVITY SCREEN	REACTIVE CYANIDE <2.0 PPM REACTIVE SULFIDE <2.0 PPM ASTM D5049 METHOD D/D4978 METHOD B				
CORROSIVITY SCREEN	SAMPLE IS NONCORROSIVE; PH=9.21 ASTM D4980 METHOD B/USEPA 9040				
IGNITABILITY TEST	SAMPLE HEATED TO 160F WITHOUT FLASH OR IGNITION. ASTM D4982 METHOD B/ASTM D93				
TCLP REVIEW	TCLP PREPARATION FOLLOWS METHOD 1311 SW-846 AS REVISED NOVEMBER 24, 1992 (57FR55114)				

--- DIRECTORS ---

--- PATHOLOGISTS ---

Patrick K. Jaynes Ph.D. John C. York II, M.D.

Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D. BFI WASTE SYSTEMS


 WILLOWCREEK LANDFILL DISTRICT
 1043 STATE ROUTE 225
 ATWATER OH 44201

 7655 Market Street, Suite 2500
 Youngstown, Ohio 44512
 (216) 758-5788
 (800) 365-3396

NAME

D#AB13340 SHOT BLAST DUST

SPECIMEN I.D. NUMBER

94726367

ACCESSION NO.

94 726367

COLLECTION DATE

03/11/94

COLLECTION TIME

14:30

CLIENT I.D. NUMBER LOCATION

6367

00000

RECEIVED

03/14/94

REPORTED

03/29/94

AMERICAN STEEL FOUNDRIES

TEST

RESULT

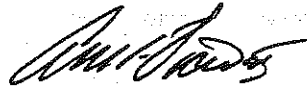
REFERENCE OR
THERAPEUTIC RANGE

UNITS

NORMAL

ABNORMAL

REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR



--- DIRECTORS ---

--- PATHOLOGISTS ---

Patrick K. Jaynes Ph.D. John C. York II, M.D.

Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D. BFI WASTE SYSTEMS

WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 442017655 Market Street, Suite 2500
Youngstown, Ohio 44512
(216) 758-5788
(800) 365-3396



CORPORATE WASTE
APPROVAL GROUP

BROWNING-FERRIS INDUSTRIES

DATE : 04/04/94
BFI Location : WILLOWCREEK LF
BFI Initiator : CASANTA, A
Generator : AMERICAN STEEL FOUNDRIES
Generator Location : ALLIANCE, OH
Waste Description : CLAY OIL DRY & PAINT SLUDGE
WCD Number : AB13321
BFI Number : 85488

WASTE APPROVAL FORM

Safety Precautions : Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial:

Facility.. BFI Mahoning, Willowcreek, Lorain County & Glenwillow

Comments:

WCD resigned dated March 11, 1994 and updated with analysis April 4, 1994.

The following items were received by the Corporate Waste Approval Group:

1. Analysis from Devor Laboratories.
2. MSD Sheets on the paint.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition & physical properties to that as defined above. This waste stream has been assigned BFI Waste Code: OH/855;219;218;217/950522/85488

CORPORATE WASTE APPROVAL GROUP

Paula J. Carboni
Technical Representative

COMPOSITION

J21 CLAY OIL DRY W/ PAINT

SPECIMEN I.D. NUMBER

94726366

ACCESSION NO.

94 726366

COLLECTION DATE

03/11/94

COLLECTION TIME

14:30

CLIENT I.D. NUMBER LOCATION

6366

00000

RECEIVED

03/14/94
REPORTED

03/30/94

AMERICAN STEEL FOUNDRIES

TEST	RESULT		REFERENCE OR THERAPEUTIC RANGE		UNITS
	NORMAL	ABNORMAL			
TCLP EXTRACTION PROC	FINAL PH=5.00				
ZERO HEADSPACE EXTRT	COMPLETED 03/15/94				
TCLP METALS & BIAS %					
ARSENIC	<0.3		0.0	5.0	MG/L
Spike recovery	92				%
BARIUM	<2.0		0.0	100.0	MG/L
Spike recovery	96				%
CADMIUM	<0.03		0.0	1.0	MG/L
Spike recovery	103				%
CHROMIUM	<0.3		0.0	5.0	MG/L
Spike recovery	110				%
SELENIUM	<0.02		0.0	1.0	MG/L
Spike recovery	94				%
MERCURY	<0.003		0.0	0.2	MG/L
Spike recovery	106				%
LEAD	<0.2		0.0	5.0	MG/L
Spike recovery	103				%
SILVER	<0.2		0.0	5.0	MG/L
Spike recovery	95				%
TCLP SUPPL.METALS					
NICKEL	<0.2				MG/L
Spike recovery	105				%
COPPER	<0.08				MG/L
Spike recovery	105				%
TCLP VOA'S & BIAS %					
METHOD NUMBER	8240				
VINYL CHLORIDE	<0.002		0.0	0.2	MG/L
Spike recovery	82				%
1,1-DICHLOROETHYLENE	<0.002		0.0	0.7	MG/L
Spike recovery	114				%
METHYL ETHYL KETONE	<1.0		0.0	200	MG/L
Spike recovery	112				%
CHLOROFORM	<0.002		0.0	6.0	MG/L
Spike recovery	114				%
CARBON TETRACHLORIDE	<0.002		0.0	0.5	MG/L
Spike recovery	112				%
BENZENE	<0.002		0.0	0.5	MG/L
Spike recovery	88				%

--- DIRECTORS ---

--- PATHOLOGISTS ---

Patrick K. Jaynes Ph.D. John C. York II, M.D.

Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D.



BFI WASTE SYSTEMS
WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 44201

7655 Market Street, Suite 2500
Youngstown, Ohio 44512
(216) 758-5788
(800) 365-3396

321 CLAY OIL DRY W/ PAINT

SPECIMEN I.D. NUMBER

94726366

ACCESSION NO.

94 726366

COLLECTION DATE

03/11/94

CLIENT I.D. NUMBER LOCATION

6366

COLLECTION TIME

14:30

RECEIVED

03/14/94

REPORTED

03/30/94

AMERICAN STEEL FOUNDRIES

TEST	RESULT		REFERENCE OR THERAPEUTIC RANGE		UNITS
	NORMAL	ABNORMAL			
1,2-DICHLOROETHANE	<0.002		0.0	0.5	MG/L
Spike recovery	102				%
TRICHLOROETHYLENE	<0.002		0.0	0.5	MG/L
Spike recovery	104				%
TETRACHLOROETHYLENE	<0.002		0.0	0.7	MG/L
Spike recovery	118				%
CHLOROBENZENE	<0.002		0.0	100.0	MG/L
Spike recovery	90				%
1,4-DICHLOROBENZENE	<0.002		0.0	7.5	MG/L
Spike recovery	104				%
TCLP BNA'S & BIAS %					
METHOD NUMBER	8270				
CRESOLS	<0.1		0.0	200	MG/L
Spike recovery	67				%
2,4-DINITROTOLUENE	<0.1		0.0	0.13	MG/L
Spike recovery	101				%
HEXACHLOROBENZENE	<0.1		0.0	0.13	MG/L
Spike recovery	77				%
HEXACHLOROBUTADIENE	<0.1		0.0	0.50	MG/L
Spike recovery	65				%
HEXACHLOROETHANE	<0.1		0.0	3.0	MG/L
Spike recovery	81				%
NITROBENZENE	<0.1		0.0	2.0	MG/L
Spike recovery	62				%
PENTACHLOROPHENOL	<0.1		0.0	100.	MG/L
Spike recovery	97				%
PYRIDINE	<0.1		0.0	5.0	MG/L
Spike recovery	50				%
2,4,5-TRICHLOROPHEN	<0.1		0.0	400.	MG/L
Spike recovery	115				%
2,4,6-TRICHLOROPHEN	<0.1		0.0	2.0	MG/L
Spike recovery	105				%
REACTIVITY SCREEN	REACTIVE CYANIDE	<2.0 PPM			
	REACTIVE SULFIDE	<2.0 PPM			
	ASTM D5049 METHOD D/D4978 METHOD B				
CORROSIVITY SCREEN	SAMPLE IS NON-CORROSIVE	PH=6.36			
	ASTM D4980 METHOD B/USEPA 9040				

--- DIRECTORS ---

--- PATHOLOGISTS ---

Patrick K. Jaynes Ph.D. John C. York II, M.D.

Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D. BFI WASTE SYSTEMS

WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 442017655 Market Street, Suite 2500
Youngstown, Ohio 44512
(216) 758-5788
(800) 365-3396

NAME
21 CLAY OIL DRY W/ PAINT

SPECIMEN I.D. NUMBER
94726366

ACCESSION NO.
94 726366

COLLECTION DATE
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14:30
CLIENT I.D. NUMBER LOCATION
6366 00000

RECEIVED
03/14/94
REPORTED
03/30/94

AMERICAN STEEL FOUNDRIES

TEST	RESULT		REFERENCE OR THERAPEUTIC RANGE	UNITS
	NORMAL	ABNORMAL		
IGNITABILITY TEST	SAMPLE HEATED TO 160F WITHOUT FLASH OR IGNITION. ASTM D4982 METHOD B/ASTM D93			
TCLP REVIEW	TCLP PREPARATION FOLLOWS METHOD 1311 SW-846 AS REVISED NOVEMBER 24, 1992 (57FR55114) REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR			



--- DIRECTORS ---

Patrick K. Jaynes Ph.D. John C. York II, M.D.
Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D.

--- PATHOLOGISTS ---



7655 Market Street, Suite 2500
Youngstown, Ohio 44512
(216) 758-5788
(800) 365-3396

BFI WASTE SYSTEMS
WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 44201

Table 1
General Data Table
American Waste Management Services, Inc.
Antech Ltd. Project No. 94-0890
Waste Characterization; AWS #4477; 4481; 4482; 4483; 4484; (Dave Hartman)
American Steel Foundry

Parameter	Analytical Method	Units	Sample Identification					
			9403-1211 Broken Cores (3/8/94)	9403-1212 Shot Blast Dust (3/8/94)	9403-1213 Cooling Bed Dust (3/8/94)	9403-1214 Floor Sweepings (3/8/94)	9403-1215 Clarifier Sludge (3/8/94)	9403-1216 Method Blank (3/15/94)
Cyanide (Total)	9012(1)	mg/kg	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Flash Point	1010(1)	°F	>200	>200	>200	>200	>200	NAP(2)
pH	9045(1)	pH units	9.07	10.04	7.59	9.94	7.01	NAP
Sulfide (Reactive)	7.3.4.1/8030(1)	mg/kg	<10	15	<10	<10	<10	<10
Polychlorinated Biphenyls	8080(1)	mg/kg	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
TCLP Metals: (3)								
Silver (TCLP)	6010(1)	mg/l	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10
Arsenic (TCLP)	6010(1)	mg/l	<0.10	0.10	<0.10	<0.10	<0.10	<0.10
Barium (TCLP)	6010(1)	mg/l	<10	<10	<10	<10	<10	<10
Cadmium (TCLP)	6010(1)	mg/l	<0.10	0.27	<0.10	<0.10	<0.10	<0.10
Chromium (TCLP)	6010(1)	mg/l	<0.10	3.4	<0.10	0.15	<0.10	<0.10
Mercury (TCLP)	7470(1)	mg/l	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
Lead (TCLP)	6010(1)	mg/l	<0.10	0.36	<0.10	<0.10	<0.10	<0.10
Selenium (TCLP)	7740(1)	mg/l	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10
TCLP Extraction Fluid Data:								
Extraction Fluid	1312(1)	-	No.1	No.2	No.1	No.1	No.1	No.1
pH with Deionized Water		pH units	10.34	9.36	9.23	10.30	8.77	NAP
pH After Addition of 1 Normal HCL		pH units	1.20	6.07	1.54	2.23	1.30	NAP
pH of TCLP Extract		pH units	4.79	5.21	4.91	5.57	4.85	4.89
Amount of Sample Extracted		g	40.0	40.0	40.0	40.0	40.0	NAP

(1) U.S. Environmental Protection Agency, 1987, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

(2) NAP = Not applicable.

(3) TCLP = Toxicity Characteristic Leaching Procedure.

Table 2
 TCLP(1) Organic Analyses
 American Waste Management Services, Inc.
 Antech Ltd. Project No. 84-0889
 Waste Characterization; AWS #13538; 13539; 13540; (Dave Hartman)
 American Steel Foundry

Parameter	CAS(2) Number	Units	Sample Identification			
			9403-1207	9403-1208	9403-1209	9403-1210
			Oil Dry & Paint (3/8/94)	Spent Foundry Sand (3/8/94)	Spent Refractory (3/8/94)	Method Blank (3/15/84)
TCLP Volatile Organic Analyses: (8260) (3)						
Benzene	71-43-2	µg/l	<50	<50	<50	<50
2-Butanone	78-93-3	µg/l	<5000	<5000	<5000	<5000
Carbon tetrachloride	56-23-5	µg/l	<50	<50	<50	<50
Chlorobenzene	108-90-7	µg/l	<1000	<1000	<1000	<1000
Chloroform	67-66-3	µg/l	<500	<500	<500	<500
1,2-Dichloroethane	107-06-2	µg/l	<50	<50	<50	<50
1,1-Dichloroethene	75-35-4	µg/l	<50	<50	<50	<50
Tetrachloroethene	127-18-4	µg/l	<50	<50	<50	<50
Trichloroethene	78-01-6	µg/l	<50	<50	<50	<50
Vinyl chloride	75-01-4	µg/l	<50	<50	<50	<50
TCLP Base/Neutral Extractables: (8270) (3)						
1,4-Dichlorobenzene	106-46-7	µg/l	<500	<500	<500	<500
2,4-Dinitrotoluene	121-14-2	µg/l	<50	<50	<50	<50
Hexachlorobutadiene	87-68-3	µg/l	<50	<50	<50	<50
Hexachlorobenzene	118-74-1	µg/l	<100	<100	<100	<100
Hexachloroethane	67-72-1	µg/l	<500	<500	<500	<500
Nitrobenzene	98-95-3	µg/l	<100	<100	<100	<100
Pyridine	110-86-1	µg/l	<500	<500	<500	<500
TCLP Acid Extractables: (8270) (3)						
Total Cresol (TCLP)	(4)	µg/l	<5000	<5000	<5000	<5000
Pentachlorophenol	87-86-5	µg/l	<5000	<5000	<5000	<5000
2,4,5-Trichlorophenol	95-95-4	µg/l	<5000	<5000	<5000	<5000
2,4,6-Trichlorophenol	88-06-2	µg/l	<100	<100	<100	<100

(1) TCLP = Toxicity Characteristic Leaching Procedure.

(2) CAS = Chemical Abstracts Services.

(3) U.S. Environmental Protection Agency, 1987, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

(4) m-Cresol 108-39-4, o-Cresol 95-48-7, and p-Cresol 106-44-5.

Table 1
General Data Table
American Waste Management Services, Inc.
Antech Ltd. Project No. 94-0891
Waste Characterization; AWS #19541; (Dave Hartman)
American Steel Foundry

Parameter	Analytical Method	Units	Sample Identification	
			9403-1217 Slag (3/8/94)	9403-1218 Method Blank (3/15/94)
ASTM:				
Acidity	305.1(1)	mg/l CaCO ₃	287	<2.00
Alkalinity (ASTM)	310.2(1)	mg/l CaCO ₃	354	<2.00
Chloride (ASTM)	9251(2)	mg/l	4.4	<0.50
Cyanide (ASTM)	9012(2)	mg/l	<0.0050	<0.0050
Fluoride (ASTM)	9251(2)	mg/l	4.6	<0.10
pH (ASTM)	9040(2)	pH units	11.72	7.30
Phenolics (ASTM)	420.2	mg/l	<0.010	<0.010
Sulfate (ASTM)	9038(2)	mg/l	4.2	<1.0
Total Dissolved Solids (ASTM)	160.1(1)	mg/l	346	<10
Metals:				
Arsenic (ASTM)	7060(2)	mg/l	<0.050	<0.050
Barium (ASTM)	6010(2)	mg/l	<10	<10
Cadmium (ASTM)	6010(2)	mg/l	<0.10	<0.10
Chromium (ASTM)	6010(2)	mg/l	<0.10	<0.10
Copper (ASTM)	6010(2)	mg/l	<1.0	<1.0
Iron (ASTM)	6010(2)	mg/l	<10	<10
Mercury (ASTM)	7471(2)	mg/l	<0.010	<0.010
Manganese (ASTM)	6010(2)	mg/l	<1.0	<1.0
Lead (ASTM)	6010(2)	mg/l	<0.10	<0.10
Selenium (ASTM)	7740(2)	mg/l	<0.010	<0.010
Zinc (ASTM)	6010(2)	mg/l	<1.0	<1.0

(1) U.S. Environmental Protection Agency, 1983, Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio.

(2) U.S. Environmental Protection Agency, 1987, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Table 1
General Data Table
American Waste Management Services, Inc.
Antech Ltd. Project No. 94-0889
Waste Characterization; AWS #13538; 13539; 13540; (Dave Hartman)
American Steel Foundry

Parameter	Analytical Method	Units	Sample Identification			
			9403-1207 Oil Dry & Paint (3/8/94)	9403-1208 Spent Foundry Sand (3/8/94)	9403-1209 Spent Refractory (3/8/94)	9403-1210 Method Blank (3/15/94)
Cyanide (Total)	8012(1)	mg/kg	1.5	<1.0	<1.0	<1.0
Flash Point	1010(1)	°F	>200	>200	>200	NAP(2)
Paint Filter	9095(1)	z	0.00	0.00	0.00	NAP
pH	9045(1)	pH units	6.07	9.01	6.34	NAP
Sulfide (Reactive)	7.3.4.1/9030(1)	mg/kg	<10	<10	<10	NAP
Polychlorinated Biphenyls	8080(1)	mg/kg	<1.0	<1.0	<1.0	<1.0
TCLP Metals: (3)						
Silver (TCLP)	6010(1)	mg/l	<0.10	<0.10	<0.10	<0.10
Arsenic (TCLP)	6010(1)	mg/l	<0.10	<0.10	<0.10	<0.10
Barium (TCLP)	6010(1)	mg/l	<10	<10	<10	<10
Cadmium (TCLP)	6010(1)	mg/l	<0.10	<0.10	<0.10	<0.10
Chromium (TCLP)	6010(1)	mg/l	0.85	<0.10	<0.10	<0.10
Mercury (TCLP)	7470(1)	mg/l	<0.010	<0.010	<0.010	<0.010
Lead (TCLP)	6010(1)	mg/l	<0.10	<0.10	<0.10	<0.10
Selenium (TCLP)	7740(1)	mg/l	<0.10	<0.10	<0.10	<0.10
TCLP Extraction Fluid Data:						
Extraction Fluid	1311(1)	-	No.1	No.1	No.1	No.1
pH with Deionized Water		pH units	7.32	8.55	7.56	NAP
pH After Addition of 1 Normal HCL		pH units	1.49	1.21	1.38	NAP
pH of TCLP Extract		pH units	4.90	4.82	4.84	4.90
Amount of Sample Extracted		g	75.0	100	100	NAP

(1) U.S. Environmental Protection Agency, 1987, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

(2) NAP = Not applicable.

(3) TCLP = Toxicity Characteristic Leaching Procedure.

HFA-20-04 NEW 0000



JOHN OESCH
PLANT MANAGER

American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150

FAX NO. (216) 821-4568

June 10, 1994

RECEIVED
JUN 14 1994
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

**CERTIFIED LETTER
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Barbara Mazur

P 482 673 307

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

P 482 673 309

Gentlemen:

UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)

Enclosed please find the revised Background Sampling Analysis for Electric Arc Furnace Baghouse Hazardous Waste Management Unit as amended in accordance with Mr. John Palmer's letter dated May 09, 1994. Since the plan was completely rewritten, for your convenience, we have also attached a two page memorandum that specifically outlines American Steel Foundries' responses to Mr. Palmer's concerns and notes the area of the Analysis in which the response is located.

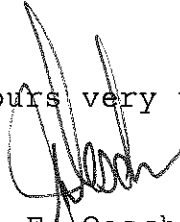
This submittal is intended to meet the requirements of the Closure Plan for the Electric Arc Furnace Baghouse Hazardous Waste Management Unit, Appendix "D". It is also intended to meet the reporting requirements of Section X of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107.

American Steel Foundries plans to perform closure of the Electric Arc Furnace Baghouse Hazardous Waste Management Unit during the August 1994 plant vacation shutdown period as stated in J.F.Oesch's letter to the Director, OEPA, dated January 11, 1994. Therefore, if upon review of this submission additional changes are required, please notify ASF as soon as possible because any delay at this point could cause us to miss the opportunity to close within the extended (180) day closure period.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,



J. F. Oesch
PLANT MANAGER

TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: BMW/RSW
JW
DJM
RML
RBR

Ohio EPA P 482 673 310
Chief, Division of Solid and Hazardous Waste
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43268-0149

Ohio EPA P 482 673 312
Division of Solid and Hazardous Waste
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Ohio EPA P 482 673 311
Supervisor, division of Solid and Infectious Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.
Amsted Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

P. C. Schillawski P 482 673 313
Squire Sanders & Dempsey
4900 Society Center
127 Public Square
Cleveland, Ohio 44114-1304

Mahoning County Health District P 482 673 314
Chief, Solid Waste Program
2801 Market Street
Youngstown, Ohio 44507-1649
Attn: R.D.Setty



JOHN OESCH
PLANT MANAGER

American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150

FAX NO. (216) 821-4568

RECEIVED

APR 08 1994

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

April 01, 1994

**CERTIFIED LETTER
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, HRE-8J
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Barbara Mazur

P 738 585 686

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

P 738 585 687

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

Progress Report # 8

This submittal is intended to meet the progress report requirements of Section X of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report.

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

RMT Engineering & Environmental Management performed the additional required background sampling on August 30, 1993.

In a letter dated November 08, 1993, American Steel Foundries submitted a Background Sampling Analysis Plan for the Electric Furnace Baghouse Management Unit to the EPA for their review and approval. A speedy approval was requested because American Steel Foundries was concerned that delays in approval and weather conditions could have adverse effects on our ability to complete closure of the Electric Arc Furnace Closure Plan within the specified (180) day limit of the consent order which expires on April 02, 1994.

In a letter dated December 21, 1993, Mr. John Palmer, Environmental Specialist, OEPA, Northeast District Office instructed Mr. Terry Bradway, Environmental Manager, American Steel Foundries to apply for an extension to the (180) day limit requirement of the consent order because the Ohio EPA needed more time to complete their technical review of the Background Sampling Plan for the Electric Arc Furnace Baghouse Management Unit.

In a January 11, 1994 letter, American Steel Foundries formally requested an extension to the closure limit of the Electric Arc Furnace Baghouse Closure Plan in accordance with the OEPA's directive.

The Ohio EPA granted the extension request on February 03, 1994 in Mr. Donald R. Schregardus's letter to Mr. Terry Bradway.

We have received competitive bids for the Electric Arc Furnace Closure Plan work and can award the contract. However, we are currently awaiting Ohio EPA approval of the Background Sampling Analysis Plan for Electric Furnace Baghouse Waste Management Unit.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.

4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or

pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.

5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.

6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

RMT Engineering and Environmental Management completed the first sampling of the landfill wells in accordance with the Groundwater Quality Assessment Plan during the week of December 13, 1993 and on February 23, 1994 results of the sampling were submitted to the U.S. EPA and Ohio EPA with our recommendations for parameters for the next three sampling events in accordance with the Consent Decree.

In a March 08, 1994 letter to Mr. Terry Bradway, Mr. John Palmer of the Ohio EPA acknowledged receipt of the test results.

In a letter dated March 11, 1994, Mr. John Palmer of the Ohio EPA approved our recommendations for the groundwater sampling parameters.

Mr. Palmer's letter of March 11, 1994 also listed several additional comments relative to the groundwater monitoring program at the Sebring Facility. We are currently preparing our response to those comments and since they were not received in time for their incorporation into the sampling process prior to the second sampling, they were not totally included.

A second sampling of the groundwater monitoring wells was performed during the week of March 14, 1994. Those results have not been received to date.

RMT will be performing the third sampling of the monitoring wells the week of June 13, 1994.

TEST RESULTS AND SAMPLING SUMMARY

Our experiments to reduce lead and cadmium in EAF dust continue.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period. We are currently moving into the next phase of our CLEAN SCRAP EXPERIMENTS. Our scrap mixture was changed in January of 1994 to include the addition of 10% obsolete plate in order to determine its impact on our furnace operation.

During this quarter several waste streams were recertified with BFI our waste hauler, see attachment "B". American Waste and BFI have also sampled several waste streams during this period but test results have not been received.

GENERAL

Please note the following change:

On January 12, 1994 Mr. T.C. Bradway, American Steel Foundries, was instructed by Ms. Barbara Mazur, U.S. EPA, Region V to change certified letter routing in the Chief, RCRA Enforcement Branch from the attention of Mr. John Saric to the attention of Ms. Barbara Mazur.

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

J.F. Oesch RBR
J. F. Oesch
PLANT MANAGER

TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: RSW
DJM
JW
ERH
RML
RBR

Ohio EPA
Chief, Division of Solid and Hazardous Waste
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43268-0149

P 738 585 688

Ohio EPA
Division of Solid and Hazardous Waste
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

P 738 585 689

Ohio EPA
Supervisor, division of Solid and Infectious Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

P 738 585 690

Edward J Brosius, ESQ.
Amsted Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

P. C. Schillawski
Squire Sanders & Dempsey
4900 Society Center,
127 Public Square
Cleveland, Ohio 44114-1304

P 738 585 691

Mahoning County Health District
Chief, Solid Waste Program
2801 Market Street
Youngstown, Ohio 44507-1649
Attn: R.D.Setty

ATTACHMENT "A"

ENVIRITE CORPORATION
CERTIFICATION ANALYSIS REPORT

American Steel Foundries
T.C. Bradway
1001 E. Broadway
Alliance, OH 44601

Report Date: 03/18/94
Envirite Waste ID#: CS1373

Sample Collection Date: 03/08/94
Date Analysis Completed: 03/15/94

Waste Description: EAF Furnace dust

<u>Parameter</u>	<u>Results</u>
pH (As Received)	9.0 S.U.
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077
TCLP Barium	<1.6 mg/L
TCLP Cadmium	3.1 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	9.8 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	0.38 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/QC Coordinator

cc: File
TSR

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION

(STOP)



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume: _____

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY
SAMPLE NO. 030894 A BOX NO. 116

Request Submitted by: T.C. BRADWAY

Date Submitted: 03/08/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 03/08/94 Time of Sampling: Box Composite AM/PM

Sampler's Name: T.C. BRADWAY

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature: T.C. Bradway

Witness's Name: _____

Title and Affiliation of Witness: _____

Witness's Signature: John M. B. O.

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries
T.C. Bradway
1001 E. Broadway
Alliance, OH 44601

Report Date: 03/18/94
Envirite Waste ID#: CS1373


Sample Collection Date: 03/01/94
Date Analysis Completed: 03/14/94

Waste Description: EAF Furnace dust

<u>Parameter</u>	<u>Results</u>
pH (As Received)	9.0 S.U.
Total CN (As Received)	0.50 mg/kg
TCLP Arsenic	<0.0077
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.8 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	12.5 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.041 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/RC Coordinator

cc: File
TSR

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 030194A

BOX NO. 150

Request Submitted by: T.C. BRADWAY

Date Submitted: 3/2/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling: 3/1/94 Time of Sampling: Comp. AM/PM

Sampler's Name: T.C. BRADWAY

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature: T.C. Bradway

Witness's Name:

Title and Affiliation of Witness:

Witness's Signature:

ENVCHCDY.EAF

Bill Schaub 3-2-94

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

Generator Name: American Steel Foundries
Generator Address: 1001 E. Broadway
Generator City, State, Zip: Alliance, OH 44601

Report Date: 03/01/94
Envirite Waste ID: CS1373
BOX #- 124

Sample Collection Date: 02/12/94
Date Analysis Completed: 02/23/94

Waste Description: EAF Furnace Dust

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.4 S.U.
Total CN (As Received)	0.50 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.3 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	3.8 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.008 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/RC COORDINATOR

cc: File
TSR

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



AMERICAN STEEL FOUNDRIES

Generator Name:

Facility Address:

1001 E. BROADWAY ST.

ALLIANCE

OHIO

44601

Stream Number:

CS1373

Date Results Needed: 7 TO 10 DAYS

Waste Code:

D006, D008

Frequency: EACH BOX

Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO.

BOX NO.

124

Request Submitted by: T.C. BRADWAY

Date Submitted: 2/15/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling:

T.C. Bradway
T.C. BRADWAY

Time of Sampling: 2/12/94/comp. AM/PM

Sampler's Name:

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature:

Witness's Name:

Title and Affiliation of Witness:

Witness's Signature:

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

Generator Name: American Steel Foundries
Generator Address: 1001 E. Broadway
Generator City, State, Zip: Alliance, OH 44601

Report Date: 02/07/94
Envirite Waste ID: CS1373
Box #: P

Sample Collection Date: 01/22/94
Date Analysis Completed: 02/01/94

Waste Description: EAF Furnace Dust

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	6.3 S.U.
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.5 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	0.82 mg/L
TCLP Mercury	0.0026 mg/L
TCLP Nickel	0.36 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.041 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Cynthia B. [Signature]
QA/QC COORDINATOR

cc: File
TSR

DATE 2/7	PAGES 1	FROM Cindy B.
TO T. W. [Signature]		CO. ENVIRITE-CANTON
BY Cindy B.		PH# 216-456-2800
FAX# 216-456-2801		FAX# 216-456-2801

MESSAGE

RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM

ENVIRITE

CORPORATION



Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume:

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 012494A

BOX NO.

P

Request Submitted by: T.C. BRADWAY

Date Submitted: 1/27/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling:

T.C. Bradway
T.C. BRADWAY

Time of Sampling: 1/22/94 6:00 AM/PM

Sampler's Name:

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature:

Witness's Name:

Title and Affiliation of Witness:

Witness's Signature:

Paul Cow

1-27-94

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

Generator Name:
Generator Address:
Generator City, State, Zip:

American Steel Metals
1001 E. Broadway Street
Alliance, OH 44601

Report Date: 01/14/94
Envirite Waste ID: CS1373
BOX #: 101

Sample Collection Date: 01/03/94
Date Analysis Completed: 01/10/94

Waste Description: EAF Furnace Dust

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	5.8 S.U.
Total CN (As Received)	0.50 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.64 mg/L
TCLP Chromium	0.82 mg/L
TCLP Lead	2.9 mg/L
TCLP Mercury	<0.00080 mg/L
TCLP Nickel	0.62 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QA/RC COORDINATOR

cc: File
TSR

**RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM****ENVIRITE****CORPORATION**

Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume: _____

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO. 010394A

BOX NO. 101

Request Submitted by: T.C. BRADWAY

Date Submitted: 1/3/94

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling:

T.C. Bradway
T.C. BRADWAY

Time of Sampling:

1/3/94

AM/PM

Sampler's Name:

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature: _____

Witness's Name: _____

Title and Affiliation of Witness: _____

Witness's Signature: Rec'd BY ENVIRITE 1-5-94 Paul Con

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

ENVIRITE CORPORATION
CERTIFICATION ANALYSIS REPORT

Generator Name:
Generator Address:
Generator City, State, Zip:

American Steel Foundries
1001 E. Broadway
Alliance, OH 44601

Report Date: 01/20/94
Envirite Waste ID: CS1373
BOX #: 148

Sample Collection Date: 12/13/93
Date Analysis Completed: 12/22/93

Waste Description: EAF Furnace Dust

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	5.6 S.U.
Total CN (As Received)	1.04 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.0 mg/L
TCLP Chromium	0.20 mg/L
TCLP Lead	13.7 mg/L
TCLP Mercury	<0.00080 mg/L
TCLP Nickel	0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:


QC RC COORDINATOR

cc: File
TSR

**RESAMPLE
SAMPLE
ANALYSIS
REQUEST
FORM****ENVIRITE****CORPORATION**

Generator Name: AMERICAN STEEL FOUNDRIES
Facility Address: 1001 E. BROADWAY ST.
ALLIANCE OHIO 44601
City State ZIP
Stream Number: CS1373 Date Results Needed: 7 TO 10 DAYS
Waste Code: D006, D008 Frequency: EACH BOX
Volume: _____

Generator's Description / Identification of Waste:
EAF FURNACE DUST

D006, D008

Comments:

TCLP METALS ONLY

SAMPLE NO.

BOX NO. 148

Request Submitted by: T.C. BRADWAY

Date Submitted: 12/15/93

CERTIFICATION:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling:

T.C. Bradway
T.C. BRADWAY

Time of Sampling: 12/13/93 Comp. AM/PM

Sampler's Name:

Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER, AMERICAN STEEL FOUNDRIES

Sampler's Signature: _____

Witness's Name: _____

Title and Affiliation of Witness: _____

Witness's Signature: _____

ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

0461

Recycled Paper

William Schaub

ATTACHMENT "B"



American Steel Foundries

1001 EAST BROADWAY • P. O. BOX 2060 • ALLIANCE, OHIO 44601

(216) 823-6150 • FAX NO. (216) 821-4568

January 10, 1994

Certified Mail

P 069 816 956

Mr. Al Casanta
BFI Willowcreek Landfill
1043 State Route 225
Atwater, Ohio 44201

Dear Sir:

WASTE STREAM CERTIFICATION

This letter is written in response to your letter of January 05, 1994.

Please renew the following waste streams for disposal by BFI for an additional twelve months:

- 1) FLOOR SWEEPINGS FROM STEEL FOUNDRY OPERATION
OH 219 940212 202143 006
- 2) BROKEN CORE BUTTS
OH 219 940212 202145 006
- 3) SPENT REFRACTORY FROM FURNACE & LADLES
OH 219 940212 202144 006
- 4) SPENT FOUNDRY SAND
OH 219 940212 202142 006
- 5) DEWATERED CLARIFIER SLUDGE
OH 219 940326 203178 006

The subject waste streams are essentially the same as when tested during 1993 and changes are not anticipated during the next twelve months. Please renew the certifications for 1994. If a significant change takes place in the composition of any of the subject waste streams, your office will be immediately notified.

If you have any additional requests, comments or concerns, please do not hesitate to call (216) 823-6550 ext. 206.

cc: JFO
RBR
RML
CAR/RSW

Very truly yours,

T.C. Bradway
T.C. Bradway
Environmental Manager

C:\WP51\SOLWASTE\WASTESTR.EAM

Willowcreek Landfill District

January 5, 1994

Mr. W.D. Heestand, Jr.
Safety & Environmental Supervisor
American Steel foundries
1001 East Broadway
Alliance, Ohio 44601

Dear Mr. Heestand,

This letter is being sent to notify you it is time to recertify your special waste streams. If your waste streams have not changed in the last year, we need a letter on your company's letterhead referencing the below listed waste streams and its lab number stating it has not changed. Please make sure you have the letter signed by the person who signed the original WCD. If this is a problem, please let me know because other alternatives can be made.

This will eliminate having to retest your waste streams provided we receive your letter before February 4, 1994.

If you should have any further questions please feel free to contact me, otherwise, we will be expecting your letter as soon as possible.

Please address all correspondence to the following address:

BFI Willowcreek Landfill
1043 State Route 225
Atwater, Ohio 44201

Thank you for your cooperation and continued concern with the environment.

- Waste Streams:
- 1) FLOOR SWEEPINGS FROM STEEL FOUNDRY OPERATION
OH 219 940212 202143 006
 - 2) BROKEN CORE BUTTS
OH 219 940212 202145 006
 - 3) SPENT REFRACTORY FROM FURNACE & LADLES
OH 219 940212 202144 006
 - 4) SPENT FOUNDRY SAND
OH 219 940212 202142 006
 - 5) DEWATERED CLARIFIER SLUDGE
OH 219 940326 203178 006

Sincerely,



Al Casanta
Industrial Waste Coordinator



American Steel Foundries

1001 EAST BROADWAY * P.O. BOX 2060 * ALLIANCE, OHIO 44601

(216) 823-6150 * FAX NO. (216) 821-4568

September 03, 1993

RECEIVED
SEP 14 1993

**OFFICE OF RCRA
WASTE MANAGEMENT DIV
EPA, REGION V**

**CERTIFIED LETTER
RETURN RECEIPT REQUESTED**

Chief RCRA Enforcement Branch, 5HR-12
U.S. EPA, Region V
230 S. Dearborn St.
Chicago, Illinois 60604
Attention: James Saric

P 329 880 567

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

P 329 880 566

Gentlemen:

**UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)**

Progress Report # 5

This submittal is intended to meet the progress report requirements of Section X of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report.

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

On August 05, 1993, American Steel Foundries received approval for the Electric Arc Furnace Closure Plan.

Since the approval, we have placed a purchase order with RMT Engineering & Environmental Management to perform the additional required background sampling and on August 30, 1993, those samples were taken. We are currently awaiting the test results.

We are in process of receiving competitive bids for the physical closure work and plan to award contracts in the near future.

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D. OHIO)

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."
3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.

On July 8, 1993 the Ohio EPA submitted written comments to American Steel Foundries covering deficiencies in the "Ground Water Quality Assessment Plan" and the "Ground Water Sampling and Analysis Plan" for the Sebring landfill. On August 5, 1993 American Steel Foundries responded to the Ohio EPA request and supplemented the plans. We are currently awaiting comments from the Ohio EPA.

TEST RESULTS AND SAMPLING SUMMARY

Our experiments to reduce lead and cadmium in EAF dust continue.

Since the last report, our test results indicate that not all loads of dust sampled are under regulatory limits for lead and cadmium. Therefore, we are pursuing a program with Enviroline Corporation that will entail composite sampling of each load. The individual loads will be shipped off site as either hazardous or nonhazardous material, depending upon the sample test results. Only those loads that are clearly below regulatory limits will be shipped as nonhazardous material and all sampling will be completed before the load is permitted to be taken off site.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

In accordance with our bi-annual waste stream analysis program, we have started our re-sampling of all waste streams.

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D. OHIO)

GENERAL

Please be advised of the following changes:

1. On July 26, 1993, we were directed by Mr. James Saric from the U.S. EPA, Region V to change our certified letter routing in the Chief, RCRA Enforcement Branch from the attention of Ms. Kimberly Ogle to the attention of Mr. James Saric.
2. In accordance with the terms and conditions of the Ohio Consent Order # 1993CV01107, signed July 12 1993, we will be forwarding an additional copy of all reports required under Civil Action No. C87-128A (N.D. Ohio) to the attention of Ohio EPA, Supervisor, Division of Solid and Infectious Waste Management, Northeast District Office, 2110 East Aurora Ave., Twinsburg, Ohio 44087-1969.
3. Effective September 1 1993, Mr. John F. Oesch has assumed the duties of Plant Manager, Alliance Plant, American Steel Foundries and as such, he has become the official plant contact and the individual authorized to sign legal documentation for American Steel Foundries at that facility.

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,


J. F. Oesch
PLANT MANAGER

/TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D. OHIO)

cc: CAR
DJM
VTH
ERH

Ohio EPA
Chief, Division of Solid and Hazardous Waste P 329 880 564
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43268-0149

Ohio EPA
Division of Solid and Hazardous Waste P 329 880 565
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Ohio EPA
Supervisor, division of Solid and Infectious Waste Management P 329 880 563
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.
Amsted Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Ave.
Chicago, Illinois 60601

P. C. Schillawski
Squire Sanders & Dempsey P 329 880 570
4900 Society Center
127 Public Square
Cleveland, Ohio 44114-1304

Mahoning County Health District
Chief, Solid Waste Program
2801 Market Street
Youngstown, Ohio 44507-1649
Attn: R.D.Setty

C:\WP51\HAZWASTE\USVAMSTE.TB5



American Steel Foundries

1001 EAST BROADWAY * P. O. BOX 2060 * ALLIANCE, OHIO 44601

(216) 823-6150 * FAX NO. (216) 821-4568

July 8, 1993

RECEIVED
JUL 15 1993

**Certified Letter
Return Receipt Requested**

Chief, RCRA Enforcement Branch, 5HR-12
U. S. EPA, Region V
230 South Dearborn Street
Chicago, Illinois 60604
Attn: Kimberly Oogle

Certified No. P 738 585 537

Chief, SWERB Section V
Office of Regional Counsel
U. S. EPA Regional V, 5CS-TUB3
230 South Dearborn Street
Chicago, Illinois 60604
Attn: Richard Clarizio

Certified No. P 738 585 536

**UNITED STATES V. AMSTED INDUSTRIES, INC.
CIVIL ACTION NO. C87-1284A (N.D. OHIO)**

Progress Report #4

This submittal is intended to meet the Progress Report requirements of Section X of the Consent Decree. The numbering of each item conforms with the Consent Decree sequence.

The following have been completed since the last report.

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

3. If Ohio EPA does not approve the Alliance EAF baghouse Closure Plan, defendant shall submit to Ohio EPA, with copy to U. S. EPA a revised or modified Alliance Closure Plan in accordance with Ohio Admin. Code 3745-66-12(D)(4).

On May 5, 1993, the OEPA sent a "Notice of Deficiency" to American Steel Foundries on the Closure Plan for the EAF Dust Collector Bag House area. Corrections to the Plan were made and resubmitted to the OEPA on June 3, 1993.

RE: UNITED STATES V. AMSTED IND., INC. CIVIL ACTION #C87-1284A
N.D. OHIO)

We are current with all reporting requirements and are awaiting Ohio EPA approval of the following:

1. The Sebring Facility Ground Water Assessment Plan.
2. The EAF Dust Collector Closure Plan as resubmitted on 6-3-93.
3. The Sebring Facility Closure Plan.
4. The Sebring Facility Test Plot Plan.

American Steel Foundries has submitted a test plot plan for the use of foundry material as an alternative to clay in the final cover design for the Sebring Landfill Facility Closure Plan and we are currently obtaining competitive contractor quotations for that work.

Test Results and Sampling Summary

Our experiments to reduce lead and cadmium in EAF dust continue.

Since the last report, test results have indicated that we are averaging below regulatory limits for EAF dust but we have not been able to keep all loads in the non-hazardous range.

We have approached Envirote Corporation who treats our EAF dust and are currently evaluating a progressive approach to dust disposal. The program would require a composite "Tclp" metals only analysis to be performed on each load of dust before the material leaves the plant. If the load is hazardous, then it would be treated by Envirote to render it non-hazardous before disposal. However, if the Tclp analysis indicates the load to be non-hazardous, then it would be disposed of by Envirote's County Environmental section as a non-hazardous material.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

In accordance with our bi-annual waste stream analysis program, we have started our re-sampling of all waste streams.

An alternate waste stream was evaluated during the last two months and approximately 1½ cubic yards of a mixture of phenolic resin, sand and oil dry were disposed of by Browning Ferris Industries. The phenolic resin from a leaky pump had been contained with a mixture of oil dry and sand during clean up and was not reusable in our process because of the presence of the oil dry. The mixture was collected, stored, sampled and disposed of in accordance with EPA procedures. (Attachment "B").

RE: UNITED STATES V. AMSTED IND., INC. CIVIL ACTION #C87-1284A
(N.D. OHIO)

In addition, Browning Ferris Industries, our current solid waste handler, has recertified the following waste streams for an additional year:

1. Clay, oil dry and paint sludge.
2. Cooling bed dust.
3. Shot blast dust. (Attachment "D")

Envirite, our hazardous waste handler has recertified our "EAF" dust waste stream for an additional year. (Attachment "C").

American Steel Foundries is actively pursuing the processing of foundry waste materials to be used as cover materials for the landfill and are currently obtaining competitive quotations for the screening and separation of that material in accordance with closure specifications.

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this Progress Report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portions(s) of this submission of document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete, to the best of my knowledge.

Yours very truly,


J. A. DIFLOURE
PLANT MANAGER

TCB:bje
cc:DJM
VTH
JAD

Enclosure

RE: UNITED STATES V. AMSTED IND., INC. CIVIL ACTION #C87-1284-A
N.D. OHIO)

Ohio EPA
Chief, Division of Solid and Hazardous Waste
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43265-0149 P 738 585 535

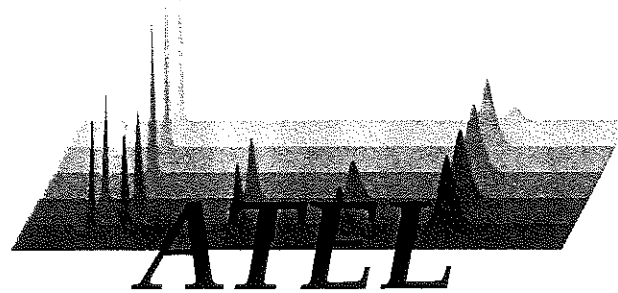
Ohio EPA
Division of Solid and Hazardous Waste
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969 P 738 585 534

Edward Brosius, Esq.
AMSTED Industries, Inc.
44th Floor - Boulevard Towers South
205 N. Michigan Avenue
Chicago, Illinois 60601 P 738 585 263

American Steel Foundries
10 South Riverside Plaza - 10th Floor
Chicago, Illinois 60606
Attn: C. A. Ruud P 738 585 264

P. C. Schillawski
Squire, Sanders & Dempsey
4900 Society Center
127 Public Square
Cleveland, Ohio 4414-1304 P 738 585 265

Edward R. Hanson
Project Manager
American Steel Foundries
Manufacturing Research Engineering Center
3761 Canal Street P 069 816 825
East Chicago, Indiana 46312



Aqua Tech Environmental Laboratories Inc.

To: AMERICAN STEEL FOUNDRIES
1001 E BROADWAY BOX 2060
ALLIANCE OH 44601

Attn: T C BRADWAY

Client # : I0297
Your Sample ID: 042893 EAF DUST
Sample Matrix : SOLID
PO #: A-19981

Lab # : 10-93-109803
Login Date : 05/07/93
Date Reported: 05/18/93
Date Printed : 05/18/93

COLLECTION INFORMATION

Date/Time/By: 04/28/93 COMP BRADWAY
Location :

Report Approved By:

Jeffrey A. Smith
Jeffrey A. Smith

Analysis	Result	Units	Analyst	EPA Method No.	Date of Analysis	Run Number
10-93-109803						
SILVER, Ag, TCLP	< 0.10	MG/L	LLL	6010	05/13/93	05000307
ARSENIC, As, TCLP	< 0.5	MG/L	LLL	6010	05/13/93	05000307
BARIUM, Ba, TCLP	< 1.0	MG/L	LLL	6010	05/13/93	05000307
CADMIUM, Cd, TCLP	0.59	MG/L	LLL	6010	05/13/93	05000307
CHROMIUM, Cr, TCLP	0.41	MG/L	LLL	6010	05/13/93	05000307
MERCURY, Hg, TCLP	0.017	MG/L	RCB	7470	05/12/93	05000269
LEAD, Pb, TCLP	< 0.10	MG/L	LLL	6010	05/13/93	05000307
SELENIUM, Se, TCLP	0.11	MG/L	LLL	6010	05/13/93	05000307
TCLP METALS EXTRACTION	--		BSR	1311	05/11/93	05000198



CANTON LABORATORY
5300 FULTON DRIVE N.W.
CANTON, OHIO 44718
216-494-3324
FAX 216-494-2961
Chain of Custody Record

Client Name:	AMERICAN STEEL FOUNDRIES	Samplers:	# (print)	(signature)	T.C. BROADWAY
Client Number:			T.C. BROADWAY		

Relinquished by: (print) T. C. BRAOWAY (signature) <i>T. C. Braoway</i>	Received by: (print) AMY ARMBRUSTER (signature) <i>Amy Armbuster</i>	DATE / TIME 5/6/93 2:40p
Relinquished by: (print) (signature) <i>Amy Armbuster</i>	Received by: (print) (signature)	DATE / TIME
Relinquished by: (print) (signature)	Received by: (print) (signature)	DATE / TIME
Relinquished by: (print) (signature)	Received by Mobile Laboratory for Field Analysis: (print) (signature)	DATE / TIME
Dispatched by:	DATE / TIME	Received for Laboratory by: (print) CAROL M. SWIGERT (signature) <i>Carol M. Swigert</i>
		DATE / TIME 05/07/93 1010

Method of shipment:

Distribution:

- White - Laboratory (include with reports)
Yellow - Laboratory (file copy)
Pink - Sample custodian
Gold - Field sampling records



AMERICAN STEEL FOUNDRIES

051493-1 EAF DUST 5-14-93

WO #: D3787

LAB #: A3E140024-001

MATRIX: SOLID

DATE RECEIVED: 5/14/93

TCLP EXTRACTION DATE: 5/17/93

FINAL PH:5.9

- - - - - TCLP TOXICITY CHARACTERISTIC METALS - - - - -

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	5/17- 5/18/93	3137028
Arsenic	ND	0.50	mg/L	SW846 6010	5/17- 5/18/93	3137028
Barium	ND	1.0	mg/L	SW846 6010	5/17- 5/18/93	3137028
Cadmium	2.0	0.10	mg/L	SW846 6010	5/17- 5/18/93	3137028
Chromium	ND	0.10	mg/L	SW846 6010	5/17- 5/18/93	3137028
Lead	3.8	0.10	mg/L	SW846 6010	5/17- 5/18/93	3137028
Selenium	0.33	0.30	mg/L	SW846 6010	5/17- 5/18/93	3137028
Mercury	ND	0.020	mg/L	SW846 7471	5/17- 5/19/93	3137028

NOTE:

AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT

INITIAL PH 3.4

CLIENT CODE _____
QUOTE / SAR NUMBER _____
Chain-of Custody Record

Division of Enesco Incorporated
4101 SHUFFEL DRIVE N.W./NORTH CANTON, OHIO 44720
(216) 497-9396 FAX (216) 497-0772

№ 28631

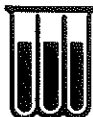
[illegible]

Chain-of Custody Record

4101 SHUFFEL DRIVE N.W./NORTH CANTON, OHIO 44720
(216) 497-9396

№ 18379

[illegible]



AMERICAN STEEL FOUNDRIES

042893 EAF FURNACE DUST 4-28-93

WO #: D2367
LAB #: A3E060042-001
MATRIX: SOLID

DATE RECEIVED: 5/06/93
TCLP EXTRACTION DATE: 5/10/93
FINAL PH: 8.3

- - - - - TCLP TOXICITY CHARACTERISTIC METALS - - - - -

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching
Procedure Method 1311 (55 FR 26986)

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNIT</u>	<u>METHOD</u>	<u>PREPARATION - ANALYSIS DATE</u>	<u>QC BATCH</u>
- - TCLP METALS - -						
Silver	ND	0.10	mg/L	SW846 6010	5/10- 5/13/93	3130046
Arsenic	ND	0.50	mg/L	SW846 6010	5/10- 5/13/93	3130046
Barium	ND	1.0	mg/L	SW846 6010	5/10- 5/13/93	3130046
Cadmium	ND	0.10	mg/L	SW846 6010	5/10- 5/13/93	3130046
Chromium	ND	0.10	mg/L	SW846 6010	5/10- 5/13/93	3130046
Lead	ND	0.10	mg/L	SW846 6010	5/10- 5/13/93	3130046
Selenium	ND	0.30	mg/L	SW846 6010	5/10- 5/13/93	3130046
Mercury	ND	0.020	mg/L	SW846 7471	5/10- 5/12/93	3130046

NOTE:

AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT

INITIAL PH 5.1



BROWNING-FERRIS INDUSTRIES

OH 855:219 940614
BFI WASTE CODE

WCD No. AA

AX
79452
2-0185

WASTE EVALUATION REQUEST

BFI to complete this area.

BFI Initiator AL CASANTA
Location 1043 ST RT 225 P. W. T. Co
Company Number 219 Date 3/19/93
Telephone Number (216) 947-7548
Action Requested: ☒ New Waste Approval
☐ Up-Date Approval ☐ Priority
☐ Other

Previous Laboratory Number _____
Management Method Requested: ☒ Landfill ☐ Hauling
☐ Other _____
Disposal Site Requested Willowick / 101 km long stone
Company Number 219/855 P.O. Number _____
Analyses Requested: ☐ TCLP ☐ RCI
☐ Other _____
Analyses To Follow: ☒ TCLP ☒ Other MSDS ATTACHED

WASTE CHARACTERIZATION DATA

Special Waste

IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED.

1. GENERATOR INFORMATION

a) Generator's Name: AMERICAN STREET FURNACE e) Local Registration No. _____
b) Generating Facility Address: 1001 E. BROADWAY Generator's EPA Id. No. 04D9S1090-112
City AKRON State OH Zip 44301
c) Company Representative: T. C. BLANCHARD f) Telephone No. (216) 523-6150 INT. 111
Title: ENVIRONMENTAL MANAGER After Hours No. (216) 11 11
d) Emergency Contact: Same Emergency No. (216) 11 11
Title _____

2. GENERAL WASTE STREAM INFORMATION

a) Description of The Waste: PETROLEUM RESIN SAND AND OIL DREGS
b) Process Generating Waste: Foundry Process
c) Is this a treatment residue of a waste which was previously a restricted characteristically hazardous waste? ☐ Yes ☒ No
d) Is this a "Hazardous Waste" as defined by State or local Regulations? ☐ Yes ☒ No
If yes, enter the Waste Identification Number if one has been assigned: _____
e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State or local Regulations?
☒ Yes ☐ No If yes, enter Waste Identification Number: None
f) Recommended personal protection equipment and special handling procedures: Use of PPE
g) Anticipated Volume: 2 ☐ Gallons ☐ Tons ☒ Cubic Yards ☐ Other _____
Per: ☐ Day ☐ Week ☐ Month ☐ Year ☒ One Time, or ☐ Other _____
To be transported in: ☒ Bulk ☐ Drums (type/size) _____ ☐ Other _____
h) Is a representative sample included? ☒ Yes ☐ No - If yes, complete the RSC found on the reverse side.

3. WASTE PROPERTIES @ 72°F

a) Physical State:
☒ Solid ☐ Semi-solid
☐ Powder ☐ Liquid
☐ Combination _____
b) Odor:
Describe Resin
☐ None ☒ Mild ☐ Strong
c) Flash Point, °F:
☐ ≤ 72 ☐ 73-100 ☐ 101-140
☐ 141-200 ☐ ≥ 201 ☐ N/A ☒ N/D
d) Layers:
☒ Single Phase ☐ Bi-layered ☐ Multi-layered
e) Density Range: N/D to _____
☐ N/D ☐ lbs./gal. ☐ g/cc.
☐ lbs./yd.³ ☐ Other _____
f) Color(s):
Describe Black, Brown
g) pH:
☐ ≤ 2.0 ☐ 2.1-5.0 ☐ 5.1-9.0
☐ 9.1-12.4 ☐ ≥ 12.5 ☐ N/A ☒ N/D

4. REACTIVITY

Note if the waste exhibits any of the following reactive properties:

<input type="checkbox"/> Water Reactive	<input type="checkbox"/> Alkaline Reactive	<input type="checkbox"/> Pyrophoric	<input type="checkbox"/> Thermally Sensitive
<input type="checkbox"/> Acid Reactive	<input type="checkbox"/> Autopolymerizable	<input type="checkbox"/> Explosive	<input type="checkbox"/> Shock Sensitive
<input checked="" type="checkbox"/> None of the above			

5. THIS WASTE CONTAINS

Note if the waste contains any of the following:

- | | | | |
|---------------------------------------|---|---|---|
| <input type="checkbox"/> Free Liquids | <input type="checkbox"/> Dioxins | <input type="checkbox"/> Etiological Agents | <input type="checkbox"/> Radioactive Materials |
| <input type="checkbox"/> Free Cyanide | <input type="checkbox"/> Organic Solvents | <input type="checkbox"/> Pathogens | <input type="checkbox"/> PCBs not regulated by |
| <input type="checkbox"/> Free Sulfide | <input type="checkbox"/> Used Oils | <input type="checkbox"/> OSHA Substances | TSCA 40 CFR 761 |
| <input type="checkbox"/> Free Ammonia | <input type="checkbox"/> Virgin Oils | <input type="checkbox"/> Biological Materials | <input checked="" type="checkbox"/> None of the above |

If any of the above are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6.

6. COMPLETE WASTE COMPOSITION

Concentration ranges are suggested, but total must equal 100%. Units must be identified and are to be in parts per million (ppm) and/or percentages (%). Attach additional pages if necessary.

Components	Range Min. / Max.	Components	Range Min. / Max.
Acetic Acid	20%		
Water	40%		
Other	40%		

7. TRANSPORTATION INFORMATION

If the waste is a DOT Hazardous Material, complete the following:

Proper USDOT Shipping Name: NA
USDOT Hazard Class: _____ UN or NA Number: _____ CERCLA Reportable Quantity: _____

8. SUPPLEMENTAL INFORMATION

☐ None ☒ MSD Sheets ☐ Analytical Data ☐ Memo/Letter ☐ Waste Composition
☐ Other - describe _____ No. of Pages _____

9. GENERATOR'S CERTIFICATION

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omissions of composition or properties exists, that all known or suspected hazards have been disclosed, and that the waste is not designated a Hazardous Waste by the USEPA or contains PCBs regulated by TSCA 40 CFR 761.

GENERATOR'S AUTHORIZED SIGNATORY:

DATE: 5/2/93 PRINT NAME: T.C. Bradley SIGNATURE: T.C. Bradley TITLE: ENVIRONMENTAL MANAGER INITIALS: TJB

REPRESENTATIVE SAMPLE CERTIFICATE

This Section is to be completed by the person obtaining the sample of the above described waste, preferably a representative of the generator. **DO NOT COLLECT OR SUBMIT SAMPLES THAT ARE RADIOACTIVE, SHOCK SENSITIVE, EXPLOSIVE, OR PYROPHORIC.**

I certify that the sample identified below that is being forwarded to BFI for evaluation is representative of the waste described above. I also understand that, should the waste material described herein not be acceptable for management by BFI Waste Systems, the sample(s) may be returned to the generator.

Collector's Name: T.C. Bradley

(Peel Off Label)

Signature: T.C. Bradley

Company: AMERICAN STEEL FABRICATOR

Title: ENVIRONMENTAL MANAGER

Telephone Number: (216) 823-6150 EXT. 206

NAME

WCD#AA79462 PHENOLIC RESIN

SPECIMEN I.D. NUMBER

93572449

ACCESSION NO.

93 572449

COLLECTION DATE

05/19/93

COLLECTION TIME

14:45

RECEIVED

05/20/93
REPORTED

06/07/93

AMERICAN STEEL FOUNDRIES

2449

00000

TEST

RESULT

NORMAL

ABNORMAL

REFERENCE OR
THERAPEUTIC RANGE

UNITS

CORROSIVITY SCREEN

IGNITABILITY TEST

TCLP REVIEW

ASTM D5049 METHOD D/D4978 METHOD B

SAMPLE NON-CORROSIVE, PH=6.67
ASTM D4980 METHOD B/USEPA 9040SAMPLE HEATED TO 160F WITHOUT FLASH OR IGNITION.
ASTM D4982 METHOD B/ASTM D93TCLP PREPARATION FOLLOWS METHOD 1311 SW-846
AS REVISED NOVEMBER 24, 1992 (57FR55114)
REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR

--- DIRECTORS ---

Patrick K. Jaynes Ph.D.
Anthony Nasrallah Ph.D.**DEYOR**
Laboratories744 Market Street, Suite 2500
Youngstown, Ohio 44512
(216) 758-6788
(800) 365-3396BFI WASTE SYSTEMS
WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 44201

APPROXIMATE TESTING COSTS: \$1100.00GENERATOR: American Steel

CUST. AUTHORIZATION:

W.C.D.# : 79462HOUSTON
LABORATORYCUSTOMER : BFI Contn.

BROWNING-FERRIS INDUSTRIES

P.O.# : 2SAMPLE ANALYSIS REQUEST / CHAIN OF CUSTODY
SPECIAL WASTEAssigned to
Laboratory:Deyor Lab

Contact:

Rusty

Location:

Blumen Ohio

Phone:

758-5788

WCD or BFI Lab No.	Waste Description	Volume/ Container	Matrix	Analyses Requested	Rush Y/N
<u>79462</u>	<u>Phenolic Resin, Sando,</u>	<u>1 gal</u>	<u>SW</u>	<u>M+Tol's Vol Semi Vol</u>	<u>N</u>
<u>572449</u>	<u>oil</u>			<u>PCI</u>	

Matrix Codes: SO = soil; MP = multi-phase; OR = organic/oil; SW = solid; SS = semi-solid

Remarks:

Safety

Precautions:

Normal

Laboratory Hygiene []

Avoid skin/

eye contact []

Avoid breathing

vapors/dust []

Special Handling/Storage:

Sample(s) Taken By: <u>T.C. Bradley</u>	Date/Time: <u>5/19/93 2:45</u>	Company: <u>American Steel Industries</u>
Sample(s) Submitted By: <u>T.C. Bradley</u>	Date/Time: <u>"</u>	Company: <u>"</u>
Sample(s) Couriersed by: <u>Al Cavata</u>	Date/Time: <u>5/20/93 2:10</u>	Company: Ship Ticket No. <u>1</u>
Sample(s) Received by: <u>John V. Vukobratovic</u>	Date/Time: <u>5-20-93</u>	Company: <u>Deyor</u>

Receiving laboratory's comments:

Note: This form must be completed and returned with the analytical data report.

NAME

WCD#AA79462 PHENOLIC RESIN

SPECIMEN I.D. NUMBER

93572449

ACCESSION NO.

93 572449

COLLECTION DATE

05/19/93

COLLECTION TIME

14:45

RECEIVED

05/20/93
REPORTED

AMERICAN STEEL FOUNDRIES

2449

00000

06/07/93

TEST

RESULT

REFERENCE OR
THERAPEUTIC RANGE

UNITS

NORMAL

ABNORMAL

1,2-DICHLOROETHANE	<0.002	0.0	0.5	MG/L
Spike recovery	90			%
TRICHLOROETHYLENE	<0.002	0.0	0.5	MG/L
Spike recovery	94			%
TETRACHLOROETHYLENE	<0.002	0.0	0.7	MG/L
Spike recovery	108			%
CHLOROBENZENE	<0.002	0.0	100.0	MG/L
Spike recovery	104			%
1,4-DICHLOROBENZENE	<0.002	0.0	7.5	MG/L
Spike recovery	86			%
TCLP BNA'S & BIAS %				
METHOD NUMBER	8270			
PYRIDINE	<0.10	0.0	5.0	MG/L
Spike recovery	61			%
o-CRESOL	<0.10	0.0	200	MG/L
Spike recovery	48			%
m-CRESOL	<0.10	0	200	MG/L
Spike recovery	46			%
p-CRESOL	<0.10	0.0	200	MG/L
Spike recovery	46			%
2,4-DINITROTOLUENE	<0.10	0.0	0.13	MG/L
Spike recovery	56			%
HEXACHLOROBUTADIENE	<0.10	0.0	0.50	MG/L
Spike recovery	49			%
HEXACHLOROETHANE	<0.10	0.0	3.0	MG/L
Spike recovery	33			%
NITROBENZENE	<0.10	0.0	2.0	MG/L
Spike recovery	38			%
PENTACHLOROPHENOL	<0.10	0.0	100.	MG/L
Spike recovery	63			%
2,4,5-TRICHLOROPHEN	<0.10	0.0	400.	MG/L
Spike recovery	58			%
2,4,6-TRICHLOROPHEN	<0.10	0.0	2.0	MG/L
Spike recovery	50			%
HEXACHLOROBENZENE	<0.10	0.0	0.13	MG/L
Spike recovery	50			%
REACTIVITY SCREEN				
	REACTIVE	CYANIDE	<2.0 PPM	
	REACTIVE	SULFIDE	<2.0 PPM	

--- DIRECTORS ---

Patrick K. Jagnes Ph.D.

Anthony Nasrallah Ph.D.


DEYOR
Laboratories

7655 Market Street, Suite 2500

Youngstown, Ohio 44512

(216) 758-6788

(800) 365-3396

EFI WASTE SYSTEMS

WILLOWCREEK LANDFILL DISTRICT

1043 STATE ROUTE 225

ATWATER

OH 44201

NAME

SPECIMEN I.D. NUMBER

ACCESSION NO.

WCD#AA79462 PHENOLIC RESIN

93572449

93 572449

COLLECTION DATE

COLLECTION TIME

RECEIVED

05/19/93

14:45

05/20/93

CLIENT I.D. NUMBER LOCATION

REPORTED

AMERICAN STEEL FOUNDRIES

2449

00000

06/07/93

TEST

RESULT

REFERENCE OR
THERAPEUTIC RANGE

UNITS

NORMAL

ABNORMAL

TCLP EXTRACTION PROC
ZERO HEADSPACE EXTRT
TCLP METALS & BIAS %

FINAL PH=5.09

5/22/93

ARSENIC

<0.20

0.0

5.0

MG/L

Spike recovery

74

%

BARIUM

<0.50

0.0

100.0

MG/L

Spike recovery

82

%

CADMIUM

<0.03

0.0

1.0

MG/L

Spike recovery

89

%

CHROMIUM

<0.30

0.0

5.0

MG/L

Spike recovery

97

%

SELENIUM

<0.02

0.0

1.0

MG/L

Spike recovery

85

%

MERCURY

<0.002

0.0

0.2

MG/L

Spike recovery

113

%

LEAD

<0.20

0.0

5.0

MG/L

Spike recovery

105

%

SILVER

<0.05

0.0

5.0

MG/L

Spike recovery

89

%

TCLP SUPPL.METALS

NICKEL

<0.20

MG/L

Spike recovery

100

%

COPPER

<0.08

MG/L

Spike recovery

102

%

TCLP VOA'S & BIAS %

METHOD NUMBER

8240

VINYL CHLORIDE

<0.002

0.0

0.2

MG/L

Spike recovery

94

%

1,1-DICHLOROETHYLENE

<0.002

0.0

0.7

MG/L

Spike recovery

108

%

METHYL ETHYL KETONE

<1.0

0.0

200

MG/L

Spike recovery

86

%

CHLOROFORM

<0.002

0.0

6.0

MG/L

Spike recovery

100

%

CARBON TETRACHLORIDE

<0.002

0.0

0.5

MG/L

Spike recovery

112

%

BENZENE

<0.002

0.0

0.5

MG/L

Spike recovery

110

%

--- DIRECTORS ---

Patrick K. Jaynes Ph.D.

Anthony Nasrallah Ph.D.



7655 Market Street, Suite 2500

Youngstown, Ohio 44512

(216) 758-6788

(800) 365-3396



BFI WASTE SYSTEMS
WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 44201



CORPORATE WASTE
APPROVAL GROUP

BROWNING-FERRIS INDUSTRIES

DATE	: 06/14/93
BFI Location	: WILLOWCREEK
BFI Initiator	: CASANTA, A.
Generator	: AMERICAN STEEL FOUNDRIES
Generator Location	: ALLIANCE, OH
Waste Description	: PENOLIC RESIN, SAND & OIL DRY
BFI Lab Number	: 206185

PRETREATMENT & DISPOSAL RECOMMENDATION

Safety Precautions : Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial: Amount of Original Waste 100% by vol.

Sanitary.. BFI Mahoning & Willowcreek

Comments:

Approved for one time only disposal. See the attached Chain of Custody and analytical data from DeYor Laboratories as received by the BFI Corporate Waste Approval Group.

The Material Safety Data Sheets received are currently on file with the BFI Corporate Waste Approval Group.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste treatment and/or disposal recommendation is based upon a review of the information provided by the generator. This recommendation is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above. This waste stream has been assigned BFI Waste Code: OH/855;219/940614/206185

CORPORATE WASTE APPROVAL GROUP

Diana L. Lasco
Technical Representative

ATTACHMENT "C"



American Steel Foundries

1001 EAST BROADWAY • P. O. BOX 2060 • ALLIANCE, OHIO 44601

(216) 823-6150 • FAX NO. (216) 821-4568

June 3, 1993

Certified Letter P 069 816 818
Return Receipt Requested

Ms. Cyndi Brownsword
Technical Service Representative
Envirite Corporation
2050 Central Ave., S. E.
Canton, Ohio 44707

Dear Cyndi:

WASTE STREAM RECERTIFICATION

Attached are waste stream recertifications for waste streams Nos. CS0285 and CS1375. Please note that the only difference between the two is that CS0285 contains smokeater dust and CS1375 does not. I have also changed the primary contact, technical contact and emergency contact from W. D. Heestand to T. C. Bradway, as Mr. Heestand is no longer with our organization.

If you have any questions or concerns, please do not hesitate to call. (216) 823-6150, Ext. 206.

TCB: jlm

cc: JAD
CAR
RSW

Very truly yours,

T. C. Bradway
Environmental Manager

Attachment

**WASTE PROFILE
CHANGE AUTHORIZATION &
CERTIFICATION
FORM**



May 12, 1993

American Steel Foundries

1001 East Broadway, Alliance, OH 44601 OHS981090418

CS0285

Dear ,

Envirite has reviewed the *Waste Profile Information Form (WPIF)* that it currently has on file for the above referenced waste stream. Please provide in the corresponding space(s) your response to the informational item(s) which Envirite has identified below, and also complete the "Generator's Certification" section. Envirite has not identified the need for additional information, then please complete only the "Generator's Certification" section. Please note that, for each subject item the information you provide on this form will be used in lieu of the information which is currently in Envirite's files. Therefore, it must be the most accurate and up-to-date that is known to you, as Envirite will rely upon it to ensure proper management of your waste stream. The code number following each item, in conjunction with the [enclosed] code key, explains the basis of Envirite's request and/or the action that is being requested of you. Please contact Cyndi Brownsword at (216) 456-6233 should you require assistance. Thank you for your attention in this matter.

INFORMATION NEEDED BY ENVIRITE

Section of WPIF	Informational Item	Code
Hazards Information	(Per most recent analysis) <u>D005/D006/D008</u>	7

INFORMATION PROVIDED BY GENERATOR

Information

American Steel Foundries will manifest as

D005/D006/D008

See Attachment

Generator's Certification

I have taken these actions: 1) I have examined the WPIF referenced above. 2) Using my knowledge and/or laboratory analysis, I have reviewed the waste generating process and all other factors affecting the waste's physical traits and chemical composition. 3) I have reviewed all land disposal restriction treatment standards applicable to this waste stream. I hereby avow that all information on the Waste Profile Information Form—including all amending, confirming, and supplemental information provided by me on this Waste Profile Change Authorization and Certification Form, that is presently known to me, is disclosed. I confirm that, to the best of my knowledge, my statements are correct and accurate representations of this waste material. I certify that I am an employee of the company which originally generated this waste and that I am authorized to sign on my company's behalf.

Name T. C. Bradway

Signature T. C. Bradway

Date June 1, 1993

WASTE PROFILE
CHANGE AUTHORIZATION &
CERTIFICATION
FORM



May 12, 1993

American Steel Foundries

1001 East Broadway, Alliance, OH 44601 OHS981090418

CS1375

Dear,

Envirite has reviewed the *Waste Profile Information Form (WPIF)* that it currently has on file for the above referenced waste stream. Please provide in the corresponding space(s) your response to the informational item(s) which Envirite has identified below, and also complete the "Generator's Certification" section. If Envirite has not identified the need for additional information, then please complete only the "Generator's Certification" section. Please note that, for each subject item, the information you provide on this form will be used in lieu of the information which is currently in Envirite's files. Therefore, it must be the most accurate and up-to-date that is known to you; as Envirite will rely upon it to ensure proper management of your waste stream. The code number following each item, in conjunction with the enclosed code key, explains the basis of Envirite's request and/or the action that is being requested of you. Please contact Cyndi Brownsword at (216) 456-6238 should you require assistance. Thank you for your attention in this matter.

INFORMATION NEEDED BY ENVIRITE

INFORMATION PROVIDED BY GENERATOR

Section of WPIF	Informational Item	Code
Hazards Information	(Per most recent analysis) D005 /D006/D008	7

Information

This material will be manifested as D006/D008 only.

Smoke Eater Dust does not enter system as with CS0285

Generator's Certification

I have taken these actions: 1) I have examined the WPIF referenced above. 2) Using my knowledge and/or laboratory analysis, I have reviewed the waste generating process and all other factors affecting the waste's physical traits and chemical composition. 3) I have reviewed all land disposal restriction treatment standards applicable to this waste stream. I hereby avow that all information on the Waste Profile Information Form—including all amending, confirming, and supplementary information provided by me on this Waste Profile Change Authorization and Certification Form, that is presently known to me, is disclosed. I confirm that, to the best of my knowledge, my statements are correct and accurate representations of this waste material. I certify that I am an employee of the company which originally generated this waste and that I am authorized to sign on my company's behalf.

Name Terry C. Bradway

Signature

T.C. Bradway

Date June 1, 1993

**WASTE
PROFILE
INFORMATION
FORM**

ENVIRITE

CORPORATION


CUSTOMER INFORMATION:

Name of Generator American Steel Foundries SIC 3325
 Facility Address 1001 East Broadway Street, Alliance, Ohio 44601
 Pickup Address - As Above -
 Primary Contact Terry C. Bradway Title Environmental Manager Phone (216) 823-6150
 Technical Contact T. C. Bradway Title " Phone (216) 823-6150
 Emergency Contact T. C. Bradway After-hours Phone (216) 823-6150
 Parent Company AKSTED Industries, Inc., 44th Floor - Boulevard Towers South, 205 N. Mich
 Generator EPA ID# OHD981090418 Generator State ID# Avenue, Chicago, IL 606
 Generator Address for Invoicing - As Above -

WASTE INFORMATION:

Generator's Description/Identification of Waste Electric Arc Furnace Dust
 Physical State at 20°C (68°F) — (Check one box.) ☐ Solid ☒ Powder ☐ Sludge ☐ Liquid
 Other Characteristics — (Complete each blank.)
 BOD _____ ppm TOX _____ ppm Color _____ Percent Free Liquid _____
 TOC _____ ppm Oils/Grease _____ ppm Percent Solids _____ Flash Point _____ °F
 Number of Phases _____ pH _____

Generator Storage Method — (Check one box.)

☐ Tank ☐ Surface Impoundment ☐ Bags ☐ Drums ☒ Roll Off ☐ Dump Trailer ☐ Other

Does this waste contain flammables? ☐ Yes ☒ No Comments _____

Does this waste have an obvious odor? ☐ Yes ☒ No If "yes," describe _____

Does this waste produce any explosive, combustible or toxic gases upon neutralization with lime? ☐ Yes ☒ No

Comments: _____

Waste Quantity:

Estimated Volume 30,000 LBS. Estimated Frequency Every 10 days

SAMPLING:

Type of Sampler — (Check one box.) ☐ Coliwasa ☐ Sludge Judge ☐ Auger ☐ Other

Is this a composite sample? ☐ Yes ☐ No If "yes," indicate how many samples: _____

Identify source of sample (e.g., lagoon, tank, etc.) _____

SHADED AREA FOR ENVIRITE USE ONLY

STREAM NUMBER <u>CS-0285 R</u>	DATE NEEDED _____
TREATMENT FACILITY <u>Canton</u>	TSR <u>SLG</u>

PROCESS INFORMATION:

Please briefly describe the process which generates this waste. Include plating activity (i.e., nickel, chrome, copper), raw solutions and base metals being plated. (Attach additional sheets if necessary.)

Dust comes from Baghouse which is connected to the electric arc furnace. The furnace is used to melt scrap steel. Smoke-eater baghouse dust is added 1/quarter at approximately 200# which is D005 material.

Are other products used in this area which may contaminate the waste (i.e., cleaning solutions or any other chemicals used by maintenance personnel)? ☐ Yes ☐ No If "yes," identify material and attach copy of Material Safety Data Sheet if available.

Material: _____

Are paint stripping operations on site? ☐ Yes ☒ No

Are cyanide plating operations on site? ☐ Yes ☒ No

HAZARDS INFORMATION:

Describe those hazards which you know or reasonably believe are associated with short-term or prolonged human exposure to this waste. Nondisclosure of information will be considered representation that you believe there are no adverse human health effects associated with exposure to this waste. Attach relevant documents as a part of your response if appropriate.

Acute and chronic toxicity of metals listed below

Is this waste an EPA RCRA Hazardous Waste as described under 40 CFR 261 and equivalent state regulations?
☒ Yes ☐ No If "yes," please identify hazardous characteristics or constituents in the lists shown below.

Characteristic Hazardous Wastes

- | | | | |
|---|--|---|--|
| <input type="checkbox"/> D001 (Oxidizers) | <input type="checkbox"/> D004 (Arsenic) | <input type="checkbox"/> D007 (Chromium) | <input type="checkbox"/> D010 (Selenium) |
| <input type="checkbox"/> D002 (Corrosive) | <input checked="" type="checkbox"/> D005 (Barium) | <input checked="" type="checkbox"/> D008 (Lead) | <input type="checkbox"/> D011 (Silver) |
| <input type="checkbox"/> D003 (Reactive) | <input checked="" type="checkbox"/> D006 (Cadmium) | <input type="checkbox"/> D009 (Mercury) | <input type="checkbox"/> Other _____ |

Listed Hazardous Wastes

- | | | | | | |
|-------------------------------|--------------------------------------|-------------------------------|-------------------------------|-------------------------------|--------------------------------------|
| <input type="checkbox"/> F006 | <input type="checkbox"/> F008 | <input type="checkbox"/> F011 | <input type="checkbox"/> K002 | <input type="checkbox"/> K005 | <input type="checkbox"/> K008 |
| <input type="checkbox"/> F007 | <input type="checkbox"/> F009 | <input type="checkbox"/> F012 | <input type="checkbox"/> K003 | <input type="checkbox"/> K006 | <input type="checkbox"/> K062 |
| <input type="checkbox"/> F019 | <input type="checkbox"/> Other _____ | | <input type="checkbox"/> K004 | <input type="checkbox"/> K007 | <input type="checkbox"/> Other _____ |

Is the waste subject to Land Disposal Restrictions (LDR) per 40 CFR 268 or its equivalent state regulations? ☒ Yes ☐ No

Does this waste require treatment to conform to Land Disposal Restrictions? ☒ Yes ☐ No

Per the LDR program's definition, the waste is a: ☐ Wastewater ☒ Nonwastewater

"Wastewaters" are wastes that contain less than 1% total organic carbon (TOC) and less than 1% total suspended solids (Nonfilterable Residues Test - Method No. 160.2 Methods for Chemical Analysis of Water and Wastes, EPA - 600/4-79-020, March 1983).

"Nonwastewaters" are those wastes that do not meet the definition of "Wastewaters."

Has EP Toxicity, TCLP or any other testing been done? ☒ Yes ☐ No If "yes," please attach copies of all reports covering the last six months.

If the waste is not classified as hazardous under federal regulations, is it regulated as a hazardous or special waste in the state where it is generated? ☐ Yes ☒ No If "yes," please list the state-specific waste codes that apply.

If constituent is present, please give an estimate of range. If space is left blank, it will be assumed constituent is not present.

METALS

	TOTAL CONCENTRATION	
	Minimum ppm	Maximum ppm
Aluminum	ND	ND
Arsenic	ND	ND
Barium	1.4	320
Beryllium	ND	ND
Boron	ND	ND
Cadmium	ND	17
Chromium	ND	ND
Chromium (+ 6)	ND	ND
Copper	ND	ND
Iron	ND	ND
Lead	50	200
Manganese	ND	ND
Mercury	ND	ND
Nickel	ND	8
Selenium	ND	.02
Silver	ND	ND
Tin	670	15,000
Zinc		
Other		

ANIONS

	TOTAL CONCENTRATION	
	Minimum ppm	Maximum ppm
Chloride	NA	NA
Sulfate		
Nitrate		
Fluoride		
Phosphate		

CHELATING AGENTS

	TOTAL CONCENTRATION	
	Minimum ppm	Maximum ppm
Ammonia	NA	NA
Cyanide Total		
Cyanide Amenable		
Cyanide Leachable		
Other		

VOLATILE ORGANIC COMPOUNDS

	TOTAL CONCENTRATION	
	Minimum ppm	Maximum ppm
Acrylonitrile (vinyl cyanide)	NA	NA
Benzene		
Bis(chloromethyl) ether		
Methylene chloride		
Methylchloromethyl ether		
Methyl ethyl ketone		
Tetrachloroethylene		
Trichloroethylene		
Vinyl chloride		
Carbon tetrachloride		
Chloroform		
Other		
Other		
Other		

SEMI-VOLATILE ORGANIC COMPOUNDS

	TOTAL CONCENTRATION	
	Minimum ppm	Maximum ppm
1,2-Diphenylhydrazine	NA	NA
1-Naphthylamine		
2-Naphthylamine		
Anthracene		
Benzidine		
Dioxins		
Ethyleneimine		
N-Nitrosodimethylamine		
p-Nitrosodiphenylamine		
Phenol		
Other		
Other		
Other		

GENERAL

	TOTAL CONCENTRATION	
	Minimum ppm	Maximum ppm
Asbestos	NA	NA
Carcinogens		
Herbicides		
PCBs		
Pesticides		
Radioactives		
Solvents		
Organometallic Compounds		
Other		
Other		
Other		

TRANSPORTATION INFORMATION:

Proper DOT Shipping Name RQ Hazardous Waste Solid ^{1.0.5} H-O-S. ORK-EDOT Hazard Class ORM-E DOT UN/NA Number NA 9189Will the temperature of the waste to be transported be greater than 110°F? ☐ Yes ☒ No Comments: _____Is Envirite handling transportation? ☒ Yes ☐ No If "no," and you are aware of who will be transporting the waste, please complete the following information:

Transporter Name _____

Transporter EPA ID# _____ State Transporter ID# _____

Transporter Contact _____ Phone _____

After-hours Emergency Contact _____ Phone _____

GENERATOR EMERGENCY RESPONSE PLAN:

Do you have a written emergency-response/spill-prevention plan in force? ☒ Yes ☐ No If "yes," is a copy available? ☒ Yes ☐ NoDo you have a spill-response team? ☒ Yes ☐ NoAre special precautions required at the time of pickup? ☐ Yes ☒ No If "yes," indicate precautions: _____

CERTIFICATIONS:

I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below.

Date of Sampling _____ Time of Sampling _____ AM/PM

Sampler's Name _____

Title and Affiliation of Sampler _____

Sampler's Signature _____

Witness's Name _____

Title and Affiliation of Witness _____

Witness's Signature _____

I hereby avow that any pertinent information that is known by the generator concerning possible hazards has been disclosed in the information contained herein and attached to this form. I confirm that, to the best of my knowledge, all statements and attachments are correct and accurate representations of this waste material.

Signature W. D. HeestandName W. D. HEESTAND, JR.

CHANGED
6-1-97
TCB
ENVIRONMENTAL
MANAGEMENT

Title ENVIRONMENTAL SUPERVISORDate 7/16/91

All information submitted on this form and its attachments will be kept confidential within the limits of existing environmental laws and regulations. We suggest that you retain a copy of this form and its attachments for your records.



Willowcreek Landfill District

June 15, 1993

Mr. T. C. Bradway
Environmental Manager
American Steel Foundries
1001 East Broadway
Alliance, Ohio 44601

Dear Mr. Bradway,

This letter is being sent to confirm your undated approval for waste streams listed below. The new approval codes are:

- 1. SHOT BLAST DUST WILLOWCREEK
OH 219 940603 85484 006
- 2. COOLING BED DUST WILLOWCREEK
OH 219 940603 85485 006
- 3. CLAY OIL DRY AND PAINT SLUDGE CARBON LIMESTONE
OH 855 940522 85488 006

PLEASE NOTIFY THE APPROPRIATE PERSONNEL OF THIS APPROVAL CODE UPDATE.

These numbers must be used on all your manifests from this point on. If you have any questions please feel free to contact me.

Thank you for your cooperation and patience in this matter.

Sincerely,

Rosana M. Marinchick P.B.

Rosana M. Marinchick
Divisional Sales Manager

CORPORATE WASTE
APPROVAL GROUP

BROWNING-FERRIS INDUSTRIES

DATE : 06/08/93
BFI Location : WILLOWCREEK
BFI Initiator : CASANTA, A
Generator : AMERICAN STEEL FOUNDRIES
Generator Location : ALLIANCE, OH
Waste Description : SHOT BLAST DUST
BFI Lab Number : 85484

PRETREATMENT & DISPOSAL RECOMMENDATION

Safety Precautions : Avoid Breathing Dust Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial: Amount of Original Waste 100% by vol.

Sanitary.. BFI Willowcreek & Mahoning
Comments:

WCD updated May 28, 1993.

The waste has the potential to cause dusting problems.

See the attached letter from the generator dated May 28, 1993, as an addendum to the WCD.

The original letter was not received by the BFI Corporate Waste Approval Group.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste treatment and/or disposal recommendation and any test data reported are based upon a review of the information provided by the generator and from the evaluation of a sample of the waste material identified as BFI 85484 which is reported to be representative of the waste material described on the enclosed BFI Waste Characterization Data (WCD) sheet. This recommendation is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above. This waste stream has been assigned BFI Waste Code: OH/219:855/840903/85484

CORPORATE WASTE APPROVAL GROUP

Diana L. Lasco
Technical Representative



CORPORATE WASTE
APPROVAL GROUP

BROWNING-FERRIS INDUSTRIES

DATE : 06/08/93
BFI Location : WILLOWCREEK
BFI Initiator : CASANTA, A
Generator : AMERICAN STEEL FOUNDRIES
Generator Location : ALLIANCE, OH
Waste Description : COOLING BED DUST
BFI Lab Number : 85485

PRETREATMENT & DISPOSAL RECOMMENDATION

Safety Precautions : Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial: Amount of Original Waste 100% by vol.

Sanitary.. BFI Willowcreek & Mahoning

Comments:

WCD updated May 28, 1993.

See the attached letter from the generator dated May 28, 1993, as an addendum to the WCD.

The original letter was not received by the BFI Corporate Waste Approval Group.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste treatment and/or disposal recommendation and any test data reported are based upon a review of the information provided by the generator and from the evaluation of a sample of the waste material identified as BFI 85485 which is reported to be representative of the waste material described on the enclosed BFI Waste Characterization Data (WCD) sheet. This recommendation is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above. This waste stream has been assigned BFI Waste Code: OH/219/855/940803/85485

CORPORATE WASTE APPROVAL GROUP

Diana L. Lasco
Technical Representative



CORPORATE WASTE
APPROVAL GROUP

BROWNING-FERRIS INDUSTRIES

DATE : 06/08/93
BFI Location : WILLOWCREEK
BFI Initiator : CASANTA, A
Generator : AMERICAN STEEL FOUNDRIES
Generator Location : ALLIANCE, OH
Waste Description : CLAY OIL DRY & PAINT SLUDGE
BFI Lab Number : 85488

PRETREATMENT & DISPOSAL RECOMMENDATION

Safety Precautions : Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial: Amount of Original Waste 100% by vol.

Sanitary.. BFI Mahoning

Comments:

WCD updated May 28, 1993.

See the attached letter from the generator dated May 28, 1993, as an addendum to the WCD.

The original letter was not received by the BFI Corporate Waste Approval Group.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste treatment and/or disposal recommendation and any test data reported are based upon a review of the information provided by the generator and from the evaluation of a sample of the waste material identified as BFI 85488 which is reported to be representative of the waste material described on the enclosed BFI Waste Characterization Data (WCD) sheet. This recommendation is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above. This waste stream has been assigned BFI Waste Code: OH/855/040622/85488

CORPORATE WASTE APPROVAL GROUP

Diana L. Lasco
Technical Representative